

## Italo Più Loyalty Program Privacy Policy.

### **INFORMATION ON THE PROCESSING OF PERSONAL DATA REGULATION (EU) No 2016/679 OF THE EUROPEAN PARLIAMENT AND COUNCIL OF 27 APRIL 2016**

Pursuant to and for the purposes of Articles 13 and 14 of Regulation (EU) No. 2016/679 of the European Parliament and of the Council 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, hereinafter, also, "Regulation" or "GDPR") and repealing Directive 95/46/EC, we inform you that the Personal Data you voluntarily make available to ITALO - Nuovo Trasporto Viaggiatori S.p.A. (hereinafter, also, "the Company" or "ITALO") will be processed in compliance with current legislation on the protection of Personal Data and, in any case, with the principles of confidentiality that inspire the Company's activities.

#### **1. Categories of Personal Data processed**

ITALO will process the following categories of Personal Data:

- a) Common personal data, provided by you at the time of enrollment in the Italo Più / Italo Più Corporate loyalty program or acquired later in the case of requests for assistance, such as but not limited to, personal data (first and last name), personal e-mail address and/or company e-mail address (for obtaining Italo Più Corporate levels), username, password, invitation code (only for Italo Più), copy of identity document, cell phone number, date of birth;
- b) Personal data you provide in restricted area (optional), such as date of birth, mobile phone number, landline phone number, residential address, city and zip code, interests, main reason for travel, language of communication, place preference.
- c) Data traceable to the travel ticket and/or services purchased and/or used, such as, but not limited to, date of travel, date of purchase, route, environment, fare, amount spent, ancillary services.

(hereinafter, also, "Personal Data" or "Data").

#### **2. Purpose of processing**

The Personal Data you make available to ITALO may be used for the following purposes:

- a) Allow and manage your membership/enrollment in the loyalty program called "Italo Più" or called "Italo Più Corporate";
- b) enable you to take advantage of the products and/or services, as well as the performance of the activities reserved for you by virtue of your membership in the program;
- c) For administrative-accounting purposes and for the fulfillment of obligations under current regulations;

d) for marketing purposes, following your eventual and specific consent, such as: the sending of informative and commercial communications, including of a promotional nature (including our newsletter), advertising material and/or offers of goods and services of ITALO and ITALO's business partners, by any means, including, but not limited to, mail, Internet, telephone, E-mail, MMS, SMS from Italy or abroad (including from countries outside the European Community) by ITALO, its parent, subsidiary and/or investee companies, as well as by natural or legal entities contractually linked to ITALO that send communications on behalf of ITALO;

e) for profiling purposes, following your eventual and specific consent, your personal data referred to in par. 1. lett. a) and b) above and the data traceable to the travel ticket and/or services purchased and/or used, referred to in par. 1 lett. c) above, may be processed to enable the processing and completion of studies and research statistics and market research, as well as for the analysis of tastes, preferences, habits, needs and consumption choices and to receive personalized offers based on purchasing preferences, by ITALO, its parent, subsidiary and/or investee companies, as well as, on behalf of ITALO, by natural or legal entities contractually linked to ITALO and/or that, in any case, collaborate in ITALO's business activities;

f) following your eventual and specific consent, for the transfer of data to ITALO's business partners for the purpose of receiving communications from them;

We remind you that, with reference to the purposes highlighted 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 referred to in point a): your membership/enrolment in the loyalty program called "Italo Più" or called "Italo Più Corporate"; - with reference to the purpose referred to in point b): to take advantage of the products and/or services, as well as the performance of the activities reserved to you by virtue of your membership in the loyalty program; - with reference to the purpose referred to in point c): for ITALO, the performance of activities of an administrative - accounting nature and the correct fulfillment of regulatory obligations. In particular, we point out that ITALO may request from you, in compliance with the requirements of the regulations in force, a copy of your Identity document in order to verify the correctness of the data referred to you in the event, by way of example, of a request, received by you, for a change in the personal data provided at the time of registration to the Program. With reference to the additional purposes highlighted in points d), e) and f), the provision of Your Personal Data, and consent to the processing of the same for the aforementioned purposes, is optional. However, any refusal by you to provide your Data and/or consent for the processing related to the aforementioned purposes and/or the provision of inaccurate and/or incomplete information may prevent the Company from: - with reference to the purpose under point d): the sending of promotional communications by ITALO; - with reference to the purpose under point e): the performance of profiling activities and the sending of personalized offers based on your purchasing preferences by ITALO; - with reference to the purpose in point f): the transfer of your Personal Data to ITALO's business partners for the purpose of receiving their communications. In this regard, again with reference to the purposes

highlighted in (d), (e) and (f) above, we remind you that any change to the consents you make, will be effective on our systems within a period of 7 days from the time of the change.

### **3. Method of treatment**

The processing of your Personal Data will be carried out by means of suitable paper, electronic and/or telematic tools, with logics strictly related to the above purposes and, in any case, in such a way as to guarantee the security and confidentiality of the Data same. In the event that the user (i) logs in or registers for ITALO's services using the login credentials of a social network (e.g. Facebook or Twitter hereinafter "Social Network") or (ii) associates his/her account with an account of the same user on a Social Network, ITALO may receive from such Social Network Data related to the user, in accordance with the terms of use and the provisions of the privacy policy of such Social Network. ITALO may add such information to User Data already collected through its services. If the user opts to share information with such Social Networks ITALO receives Data from them in accordance with the consent options provided by the user. Any Personal Data disclosed by the Social Network will be subject to the Social Network's terms and conditions of use.

### **4. Recipients or Categories of Recipients of Personal Data**

Your Personal Data may come to the attention of the shareholders, members of the board of directors or other administrative body, the Data Protection Officer, and, in any case, the Data Processors designated by ITALO and the Personal Data Processors appointed by the Company in the exercise of their functions. Your Personal Data may be disclosed to any entities that provide ITALO with services or performances instrumental to the purposes indicated in par. 2 above such as, but not limited to, parent, subsidiary, investee and/or associated companies. Your Personal Data may also be communicated to suppliers, contractors, subcontractors, banking and/or insurance institutions or other entities and/or entities that provide (on behalf of ITALO): - the management and/or maintenance of the websites and electronic and/or telematic tools used by ITALO; - the management of the adhesion/registration to the loyalty program called "ITALO Più" or called

"Italo Più Corporate"; - to the sending of informative and promotional communications, also of a commercial nature, advertising material and/or offers of goods and services; - to the performance of profiling activities, including the detection of habits, tastes, preferences and consumer choices, as well as to the processing and performance of studies and market research. Your Personal Data may possibly be transferred abroad, in accordance with current regulations, including to countries outside the European Union where the Company may pursue its interests. Transfer to non-EU countries, apart from cases where this is guaranteed by adequacy decisions of the European Commission, is carried out in such a way as to provide appropriate and adequate safeguards in accordance with Articles 46 or 47 or 49 of the Regulations.

### **5. Duration of processing and criteria used for the storage of Personal Data**

5.1 Duration: For the purposes referred to in letters a), b) and c) of paragraph 2 "Purposes of the Processing" of this notice, your Personal Data will be processed only for the necessary time, not exceeding the time necessary for the fulfillment of applicable regulatory obligations. For the purposes of marketing, profiling and communication to ITALO's business partners referred to in letters d), e) and f) of paragraph 2 "Purposes of the Processing" of this notice, Your Personal Data will be processed until the Data Subject withdraws consent, if any.

5.2 Retention: Data will be retained according to the following criteria: - the Data processed for the adherence/registration to the loyalty program referred to in letters a), b) and c) of paragraph 2 "Purposes of the Processing" of this policy, will be retained for as long as you adhere to the same program and for a period of 10 years following the termination of the relationship, unless the need for further retention arises, in order to allow ITALO to defend its rights; - the Data processed for marketing and profiling purposes referred to in letters d) and e) of paragraph 2 "Purposes of the Processing" of this policy, will be kept for a maximum time of 24 months.

## **6. Rights of the Interested Party**

We inform you that at any time with respect to your Data, you may exercise the rights provided within the limits and under the conditions set forth in Articles 7 and 15-22 of the Regulations. For the exercise of these rights, described below, please contact the Data Controller through the Privacy Office at the email address [privacy@ntvspa.it](mailto:privacy@ntvspa.it); appropriate feedback will be provided to such request in accordance with the timelines provided by the GDPR.

In relation to the data subject to the processing referred to in this notice, you are entitled at any time to:

- Withdrawal of consent (Article 7 of the GDPR)
- Access (Article 15 of the GDPR), including the right to obtain a copy of personal data concerning you, provided that the rights and freedoms of others are not affected;
- Rectification (Article 16 of the GDPR);
- Cancellation (Art. 17 GDPR);
- Limitation (Art. 18 GDPR);
- Portability, understood as the right to obtain data from the data controller in a structured, machine-readable format for transmission to another data controller without hindrance, if technically feasible (Art. 20 GDPR);
- Objection to processing (Article 21 of the GDPR).

As a reminder, pursuant to Article 77 of the Regulations, you may lodge a complaint with the Guarantor Authority in the event of a violation of current legislation on the protection of personal data by following the procedures and directions published on the Authority's official website at [www.garanteprivacy.it](http://www.garanteprivacy.it)

## **7. Data Controller, Data Processors and Data Protection Officer.**

The Data Controller of your Data is ITALO - Nuovo Trasporto Viaggiatori S.p.A., with registered office in Rome (RM), Via Casilina, 1 - 00182, in the person of the Legal Representative pro tempore. Any request regarding personal data processed by ITALO - Nuovo Trasporto Viaggiatori S.p.A. may be sent to the registered office of the Company, or by writing to the e-mail address [privacy@ntvspa.it](mailto:privacy@ntvspa.it).

The updated list of the individuals appointed as Data Processors in accordance with Article 28 of the GDPR is available at the Company and can be known through a special request made in the manner indicated above. The contact of ITALO's Data Protection Officer is [dpo@ntvspa.it](mailto:dpo@ntvspa.it) This policy will be subject to updates. ITALO therefore invites Users who wish to know how ITALO processes Personal Data collected by ITALO to periodically visit this page.

Last revision: June 2024

### **Data controller**

ITALO - Nuovo Trasporto Viaggiatori S.p.A