

INFORMATION ON THE PROCESSING OF PERSONAL DATA

FOR THE "IN-LOMBARDIA" WEBSITE

Before you provide us with personal data, in accordance with Reg. EU 679/2016 of the GDPR (General Data Protection Regulation) and Legislative Decree No. 196 of 30 June 2003, the Privacy Code (as amended by Legislative Decree No. 101 of 10 August 2018), the aim of which is to protect the fundamental rights and freedoms of natural persons, in particular the right to protection of personal data, you need to take note of a number of information that may help you understand the reasons why your personal data will be processed, what your rights are and how you can exercise them.

1. Purpose and legal basis of personal data processing

The processing involves the following types of data:

- a) general data: name, surname, e-mail address, address, telephone number and place of collection of the Passport.

You are informed that your personal data are processed by Aria S.p.A. for the following purposes:

- i. in order to send, by e-mail, communications of a promotional nature, relating to the tourism sector, via the In-Lombardia portal pursuant to Art. 6, par. 1(a) of the Regulation (consent given by the data subject);
- ii. in order to allow you to register on the portal and create a profile as a "Tourist" in the In-Lombardia Digital Tourism Ecosystem in the performance of a contract, pursuant to Art. 6, par. 1(b) of the Regulation; and/or
- iii. in order to allow you to create and withdraw your In-Lombardia Passport in the performance of a contract, pursuant to Art. 6, par. 1(b) of the Regulation.

2. Methods of data processing

Personal data will be processed on paper and/or by electronic or automated means in accordance with the principles of necessity and minimisation, and only for the time strictly required to achieve the purposes pursued. The Data Controller shall take appropriate technical and organisational measures to ensure a level of security appropriate to the type of data processed.

3. Data Controller

The Data Controller is Aria S.p.A. - Azienda Regionale per l'Innovazione e gli Acquisti S.p.A. (Tax Code and VAT 05017630152) - with registered office in Via Torquato Taramelli 26, 20124 Milan (MI), Italy.

4. Data Protection Officer (DPO)

The Data Protection Officer ("DPO") of Aria S.p.A. can be contacted at the following e-mail address: rpd@ariaspa.it.

5. Provision of personal data and consequences of refusal

The use of personal data is optional for the pursuit of purpose i., but failure to provide such data would make it impossible to carry out the relevant processing operations. However, you have the right to revoke your consent at any time. Withdrawal of consent does not affect the lawfulness of processing prior to withdrawal.

The provision of your personal data for the fulfilment of purposes ii. and iii., is necessary and therefore any refusal to provide such data in whole or in part may result in the impossibility for the Data Controller to properly perform all required fulfilments, including the performance of a task of public interest or the exercise of public powers vested in it.

6. Communication and dissemination of personal data

Your data will be processed exclusively by the Data Controller, the appointed data processors as well as the relevant staff specially trained in data processing and data protection in order to ensure the same level of security as offered by the Data Controller. Personal data will never be disclosed to third parties except in fulfilment of any legal obligations. The data will not be disseminated in any way.

7. Automated processes and profiling

The personal data provided are not subject to any fully automated decision-making process, including profiling, which may produce legal effects on you or significantly affect your person.

8. Transfer of personal data to countries outside the European Union

For requirements strictly related to the management of processing operations, your personal data may be transferred within and outside the European Economic Area, adopting appropriate and adequate safeguards to protect your rights, pursuant to Article 46 of the GDPR, as set out in Mailup's Privacy Policy available at the following link: <https://mailup.it/informativa-privacy>.

The provider Mailup, on its website, makes available the Licence Agreement for the use of the Mailup platform, including the Standard Contractual Clauses referred to in Article 46 of the GDPR, which can be consulted at the following link: <https://mailup.it/contratto-di-licenza-uso>.

9. Data retention periods

Please be informed that your personal data will be kept for the period of time necessary to allow you to use the services of the "In-Lombardia" website and until you decide to unsubscribe. Upon your request for cancellation and withdrawal of your Passport, your personal data will be immediately anonymised and/or deleted.

10. Rights of the data subject

As a data subject, you are entitled to exercise the following rights in the cases expressly provided for by law (Art. 15 et seq., EU Regulation 2016/679):

- a) to request from the Data Controller access to the personal data concerning you, and/or their possible rectification or erasure;
- (b) to request the Data Controller to restrict the processing under its area of competence or to object to the processing;
- (C) to require the so-called "portability" of data (i.e. their communication in a structured, commonly used, and machine-readable format), including for the purpose of being able to communicate your personal data to another Data Controller;
- d) to revoke, at any time, your consent to the processing of your data (if the processing is carried out on a consensual basis, and without prejudice to the lawfulness of the processing performed prior to revocation of consent);
- (e) to file a complaint with a supervisory authority (the Data Protection Authority).

Your requests to exercise your rights should be sent to the e-mail address privacy@pec.ariaspa.it or by registered mail at Via Torquato Taramelli 26, 20124 Milan to the attention of "Struttura Supporto Normativo Protezione dei Dati Personali di Aria S.p.A."