

## Privacy Policy Information - pursuant to articles 13 and 14 of EU Regulation no. 2016/679 (hereafter, also, the "GDPR")

Last review: 8 June 2018

The data controller is Arriva Italia S.r.l., with registered headquarters in via Trebazio 1, 20145, Milan (hereafter, also, the "Owner").

The Data Controller has appointed a personal data protection officer (hereby indicated as the "Data Protection Officer" or the "DPO"), that you can contact to grant your rights, as well as to receive any information, by writing to the following email address: [privacy@arriva.it](mailto:privacy@arriva.it).

The protection and respect of your personal data are important for the Owner

Together with the Terms of use of our sites [www.arriva.it](http://www.arriva.it) and [estore.arriva.it](http://estore.arriva.it) and with any other document to which reference is made in them, these information indicates the bases under which any personal data collected or supplied by you will be treated. Please read the following carefully in order to understand our vision and our practices regarding the treatment modalities of your personal data and related information. Either Visiting the sites [www.arriva.it](http://www.arriva.it) and [estore.arriva.it](http://estore.arriva.it) or providing information and data in the cases described below, you are acknowledging and, where appropriate, consenting the process described in this statement.

### 1. Which kind of data do we collect?

- **Data provided by you.** Every time you take an access to our sites in the different sections (contest, promotion, surveys, "work with us") fill out the forms available on them, contact us through the different ways available, purchase tickets or use our Services - even through our App - you will provide us with your data. The personal information you provide on such occasions may include your name, date of birth, address, e-mail address, telephone number and financial information such as, for example, credit card references, personal images, geographical location, IP or MAC address or other details regarding the use of your mobile device or laptop.
- **Data collected by us.** On each access and visits to our Sites, like the App, we may automatically collect the following personal information :
  - technical information, such as the IP address used to connect your mobile device or Internet computer, your login information, browser type and version, settings related to the time zone, type and version of browser plug-ins, system and operating platform;
  - information relating to your access, including the entire URL, click flows to, through and from our sites (including the date and time); products that you have viewed or searched for; response times page, download errors, duration of visits to specific pages, interaction information of the page (such as scrolling, click and mouse-over) and the methods used to navigate from the page and any telephone number used to contact customer service.
  - Information we receive from other sources. We may receive information about you if you use it any other Site that we manage or use other services we provide. We also work closely in contact with third parties (including, but not limited to, business partners, sub-service providers technical,

payment and delivery, analysis providers, research information providers, agencies of credit) and we may receive information from them about you.

- Data belonging to particular categories (c.d. sensitive data). We will not try intentionally or systematically to collect, store or otherwise use information about you qualified as "special categories of data" or "sensitive data" (for example, information relating to membership of trade union organization, ethnic origin or health status information).

## 2. Cookies

Our Sites use cookies in order to be able to distinguish you from other users of our sites. This allows us to provide you an optimal browsing experience when visiting our sites, improving them. For further information on the cookies and the purposes We invite you to read our Cookie policies on the sites.

## 3. Purpose and legal basis of the treatments

Data provided by you: we use the data you provided for the following purposes and under the legal bases of treatment specified below:

Purpose of the treatment	Legal base of the treatment
a) Satisfaction of legal obligations, national rules, monitoring authorities or other legal authorities	Satisfaction of legal obligation
b) Satisfaction of the requests from you from time to time formulated by filling in the appropriate forms available on the Sites.	Execution of the contract / satisfaction of the request
c) Satisfaction of your registration request to Sites and provision of related services (eg purchase of securities travel).	Execution of the contract / satisfaction of the request
d) Sale of the ticket (s) for the journey selected.	Execution of the contract / satisfaction of the request
e) Management of applications and curriculum vitae, for the purposes of the possible selection and conclusion of a contract of employment or collaboration	Execution of the contract / satisfaction of the request
f) Sending communications of commercial nature (including newsletters) on the activities and services of the owner	Legitimate owner interest
g) Geolocation of your position in order to allow us to provide you with more accurate information in relation to the means and routes available.	Consent

**Data collected by us.** The computer systems and software procedures operate to normally acquire some personal data whose transmission is implicit in the Internet communication protocols. This information is

not collected to identify individuals, but with the aim of processing and associating data held by third parties, allowing users to be identified. This category of data includes IP addresses or domain names of computers used by users to connect the sites, addresses in URI notation (Uniform Resource Identifier) of the requested resources, time of the request, method used in submitting the request to the server, size of the file obtained in response, numeric code indicating the status of the response given by server (successful, error, etc.) and other parameters relating to the operating system and IT environment User.

These data constitute the register of connections. This data is used by Arriva Italia S.r.l. for the sole purpose to obtain anonymous statistical information on the use of the Sites and to check their correct functioning. The register of the connections is then kept available to the Judicial Authority and exhibited only under explicitly request.

**Legal basis of the processing and nature of the provision.** The legal basis of the treatments above described depends on the personal data from time to time collected and processed, as well as the specific context in which they are collected.

Except for the purpose of sending commercial communications and geolocation indicated in previous table - respectively in letters f) and g) - the provision of personal data for the purposes indicated in the previous table - letters a), b), c), d) and e) - is mandatory. Therefore, your refusal to provide your personal data will not allow us to provide you with information, services and, in any case, reply to the request formulated by you through the sites.

Otherwise, for the purpose of sending commercial communications as per letter f) of the previous table, the provision of personal data is optional, with the consequence that your refusal will not prevent us to follow up on your request through the sites.

Similarly, for the purpose of geolocation (letter g) of the table above, the provision of personal data is not mandatory. Therefore, any refusal to provide your personal data for this purpose will prevent you from satisfying the request formulated through the sites, but not to supply you more accurate information regarding the means and routes available. With reference to geolocation - which is based on your consent, we inform you that, at any time, you have the right to revoke your consent.

#### **4. Sharing your information**

To pursue the above mentioned purposes, we may communicate your personal data to the following categories of recipients:

- public authorities, supervisory and control bodies, as well as competent judicial authorities, agencies governmental or other third parties also for the purpose of exercising, establishing or defending our rights at home judicial;
- the Deutsche Bahn Group company ([www.bahn.de](http://www.bahn.de));
- the Arriva Group company ([www.arriva.co.uk](http://www.arriva.co.uk));
- subsidiaries or affiliates of Arriva Italia S.r.l.;
- subjects who carry out tasks of a technical and organizational nature on behalf of Arriva Italia S.r.l.;
- subjects that perform acquisition, processing and data processing services necessary for use customer services;
- subjects that provide services for the management of the Sites and their information system;
- parties that provide customer assistance;

- firms and companies that provide services to Arriva Italia S.r.l. in the context of assistance and consultancy relationships;
- subjects that carry out operations of control, revision, certification of the activities carried out by Italy also arrives in the interest of its customers and users;
- companies and consultants specialized in carrying out informative interviews, in the execution of the psycho-attitudinal tests and in the evaluation of their results;
- companies for the supply of functional services for recruitment / selection (such as, i.e., services computer or storage).

We may also communicate your personal data to a **buyer or potential buyer (considering also their agents and consultants)** in relation to any reorganization, restructuring, merger or sale, or any other operation regarding transfer of assets. In all these hypotheses, we will inform any subject recipient of Your personal data you must use exclusively for the purposes indicated in this statement.

The subjects belonging to the above categories operate as distinct Data Controllers or in quality of data processors appointed for this purpose by Arriva Italia S.r.l. Personal data may also be known to Arriva Italia S.r.l. employees / consultants who have been specifically appointed as authorized parties.

## 5. Period of storage of personal data

We will not process your personal data for a period longer than it is necessary to pursue the purposes for which the personal data were collected and, subsequently, we will keep them exclusively for the period necessary to comply with current legislation (including the prescription provisions of rights).

The following table shows in greater detail the period for which Arriva Italia S.r.l. will keep the different types of personal data:

Scope	Storage time
Compliance with obligations established by laws, regulations and / or national regulations or Community, from supervisory and control bodies, by judicial authority and any other authorized authorities.	Personal data will be processed for the strictly necessary period to fulfill the obligation imposed by the law and kept for the next one possibly established by law.
Satisfaction of requests formulated from time to time by filling the appropriate forms available on the Sites.	Personal data will be processed for the time strictly necessary to satisfy your request formulated through the Sites and, in any case, they will be canceled 6 months after processing the request.
Satisfaction of your request of registration to the Sites and supply of related services.	Personal data will be kept for the period of your registration on the sites.
Sale of the ticket(s) for the trip selected by you.	Personal data will be processed for the strictly necessary time of execution of the contract, until the end of the trip. Beyond this date, data will be kept exclusively for the period of time necessary to comply with the regulations in force (including the provisions on statute of limitations).
Management of applications and curricula vitae, for the purposes of possible selection	Personal data will be processed for the time strictly necessary to satisfy your request and,

and conclusion of a work or collaboration contract.	in any case, they will be cancelled 6 months after the execution of the request, except in the case of termination of the employment relationship or collaboration.
Sending of commercial communications (including newsletters) on the activities and services of the Data Controller.	Personal data will be processed by the Data Controller until your decision to terminate the processing.
Geolocation of your location in order to allow us to provide you more accurate information regarding the means and routes available.	The personal data collected for this purpose will be processed exclusively to satisfy your request and will be kept for the time necessary to improve your experience on the sites and the best use of our services.

## 6. Safety information

We adopt appropriate technical and organizational security measures in order to protect your personal data processed through access, collection, use, disclosure, copying, modification or unauthorized transfers. All the Personal data provided or collected is stored on secure servers. Arriva Italia S.r.l. is part of the Deutsche Bahn Group - Arriva, which, in addition to carrying out training courses for its employees concerning the policies and procedures internally adopted on privacy, has implemented an access system exclusively allowed to authorized employees, in accordance to the role covered. We also act in order to ensure that all the service providers we charge for treat personal data on our behalf, take appropriate technical and organizational measures in order to safeguard these personal data.

## 7. Update of this information

We may update this information from time to time, in consideration of regulatory changes, commercial techniques or developments. Appropriate measures are adopted to inform you, with the relevance of the changes made. We will ask your consent for any substantial change to the information given and, whenever required by the legislation on applicable personal data protection.

It is possible to check the latest update of this information by viewing the "last date" update" shown at the beginning of the same.

## 8. Your rights regarding the protection of personal data

In relation to the treatments described in this Notice and under the conditions provided by the GDPR, as an interested party you can , exercise the following rights:

- right of access: the right to obtain confirmation that personal data is being processed and, in this case, obtain access to your personal data - including a copy of the same and a communication, among others, of the following information:
  - a) purpose of processing;
  - b) categories of personal data processed;
  - c) recipients;
  - d) data retention period or criteria used;
  - e) rights of the data subject (rectification, cancellation of personal data, limitation of processing and right of opposition to the treatment;

f) the right to lodge a complaint;

g) the right to receive information on the origin of personal data (if they have not been collected at the person concerned);

h) the existence of an automated decision-making process, including profiling;

- right of rectification: right to obtain the rectification of inaccurate personal data concerning you and / or the integration of incomplete personal data;

- right to cancellation: the right to obtain the cancellation of personal data that you concern when:

a) the data are no longer necessary with respect to the purposes for which they were collected or otherwise processed;

b) You have withdrawn your consent and there is no other legal basis for processing;

c) You have successfully opposed the processing of personal data;

d) the data have been processed unlawfully,

e) the data must be deleted to fulfill a legal obligation;

f) personal data have been collected in relation to the information society services offered by referred to in Article 8, paragraph 1, GDPR.

The right to cancellation does not apply for the fulfillment of a legal obligation, for a public interest or for the defense of a right in a court;

- right to limitation of treatment: the right to obtain the limitation of the processing, when:

a) the data subject disputes the accuracy of personal data;

b) the processing is unlawful and the data subject opposes the deletion of personal data and asks instead that its use is limited;

c) personal data are necessary for the interested party for the defence of a right in a court;

- right to object: the right to object to the processing of personal data concerning you, except there are legitimate reasons for the Data Controller to continue processing;

- right to data portability: the right to receive, in a structured format, commonly used and readable by an automatic device, the personal data concerning you provided from the Owner and the right to transmit them to another holder without impediment, if the treatment is based on consent and is carried out by means automated. Furthermore, the right to have your personal data transmitted directly by Arriva Italy to another owner if this is technically feasible;

- lodge a complaint with the Italian Data Protection Authority (“Garante”), Piazza di Montecitorio n. 121 00186, Rome (RM).

## 9. Questions on the informative present

For any further questions, concerns or requests regarding this information or in relation to processing performed by us in relation to your personal data, you can contact us by e-mail at the following address [privacy@arriva.it](mailto:privacy@arriva.it) or to the following address: via Trebazio 1, 20145 Milan.