

## ***RELATIONS WITH CUSTOMERS AND THIRD PARTIES***

### **PRIVACY POLICY PURSUANT TO ARTS. 13 AND 14 OF EU REGULATION NO. 679/2016 (GDPR)**

#### **DATA CONTROLLER AND CONTACTS**

The Data Controller is Azienda Trasporti Milanesi S.p.A. (A.T.M. S.p.A.), with registered office in Foro Buonaparte 61, 20121, Milan (Italy). The Data Protection Officer, whom you can contact to exercise your rights under art. 13 and/or for any clarifications regarding personal data protection, can be contacted at the following email address: [rpd@atm.it](mailto:rpd@atm.it).

#### **PURPOSE OF THE PROCESSING AND LEGAL BASIS**

The purpose of the processing is to provide answers with regard to information, suggestions and complaints about the following services:

- local public transport in Milan, Monza Brianza and hinterland (TPL ATM, NET and S5 regional railway line);
- information and support for passengers with disabilities;
- parking, parking zones and vehicle removal enforcement;
- payment for parking via mobile APP and road parking meters;
- bike sharing \*;
- dial-a-ride bus service;
- tramway restaurant;
- Areas B and C \*;
- improvement in service rendered.

The legal basis is the consent expressed via positive action (staying on the line after the recorded message or sending a written or electronic message through any available communication channel) pursuant to art. 6, para. 1, letter a) of EU Regulation No. 679/2016.

#### **CATEGORIES OF DATA PROCESSED AND RECIPIENTS**

Data processed are ordinary and specific personal data. Personal data are processed by personnel authorized by the data controller and may be communicated to companies that provide goods and/or services related to the processing.

#### **METHODS OF PROCESSING AND POSSIBLE TRANSFER OF DATA**

The data are processed only for the purposes mentioned above and according to the principles of lawfulness, correctness, transparency, accuracy, integrity and confidentiality established by the regulations in force. The personal data management may also take place through automated and computerized processes. No personal data collected will be transferred outside the European Economic Area.

#### **DATA RETENTION PERIOD**

The data will be kept for 10 years, except in the event of litigation in which case the data will be kept until the judgement becomes final for all levels of judgement provided for by the applicable judicial system.

#### **DATA SUBJECT RIGHTS**

All the rights of the data subject are guaranteed in accordance with the provisions of Articles 15, 16, 17, 18, 20, 21, 22 and 77 of the GDPR:

(\* ) For the bike sharing service and Areas B and C, the Data Controller is the Municipality of Milan, while ATM manages customer relations (e.g. through call centers).

- right of access to personal data and all information on the processing carried out;
- right to rectification of inaccurate personal data and integration of incomplete personal data;
- right to erasure ('right to be forgotten');
- right to limit the processing of personal data;
- right to data portability;
- right to object to the processing of personal data;
- right not to be subject to a decision based solely on automated processing;
- right to lodge a complaint with the Italian Data Protection Authority in case a violation is thought to have been carried out.