

VERIFICATION OF THE GREEN PASS TO CUSTOMERS FOR THE ACCESS TO THE ATM GROUP LOCATIONS

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

The personal data relating to customers who access the ATM Group locations (by way of example and not limited to: ATM Point, Net Point, nursery schools) will be processed in accordance with EU Regulation No. 679/2016, according to the methods explained below, in order to check the possession and correct presentation of the valid Green Pass by those same subjects, for the purpose and in the course of the pertinent checks envisaged by law.

DATA CONTROLLER AND CONTACTS

The Data Controller is Azienda Trasporti Milanesi S.p.A. (ATM), 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.

INTERESTED SUBJECTS

The customers who access the ATM Group locations (by way of example and not limited to: ATM Point, Net Point, nursery schools).

PURPOSE OF THE PROCESSING AND LEGAL BASIS

- To contain the spread and contagion of the Covid-19 virus.
- To check the authenticity, validity and integrity of the Green Pass, including the certification of exemption for the customers' access to the ATM Group locations where commercial activities are carried out other than those necessary to ensure the fulfillment of the essential and primary persons' needs determined with the DPCM of 21st January 2022.

The legal basis for the data processing is the need to comply with the following legal obligations pursuant to art. 3 Law Decree 1/2022. Check, by the subjects delegated to the checks, of the Green Pass (or the certification of exemption from vaccination campaign) of the customers who access the ATM Group locations where commercial activities are carried out other than those necessary to ensure the fulfillment of the essential and primary persons' needs determined with the DPCM of 21st January 2022.

PROCESSED DATA

- Name, surname and date of birth of the holder of the Green Pass.
- Unique identifier of the certificate.

PROCESSING METHODS

The processing will be carried out by personnel authorized and trained for this purpose (so-referred subjects delegated to the checks). The verification activity is carried out exclusively by scanning the "QR code" reported by the Green Pass, through the use of the C-19 Verification application. The Green Pass is presented to the personnel in charge in paper or digital form. In the event of any uncertainty as to the identity of the data subject, the presentation of an identification document may be required for a comparison with the data collected by the scanning of the QR code. In the case of a paper Green Pass, the document has to be folded in such a way as to show only and exclusively the so-called QR code that has to be scanned. In the case of a digital Green Pass, only the so-called QR code has to be shown and scanned.

Such verification is necessary in order to allow customers to access the ATM group locations where commercial activities are carried out other than those necessary to ensure the fulfillment of the essential and primary persons' needs determined with DPCM of 21st January 2022.

CONSEQUENCES IN CASE OF DETECTION, REFUSAL TO PROVIDE DATA OR FAILURE TO TRANSMIT COMMUNICATION

In case of refusal to show the Green Pass, both on paper and digitally, or in the case of failure to show the identity document for the communication of personal data to the verifier, it is prohibited the customer's access to the localities of the ATM Group where commercial activities are carried out.

NATURE AND DURATION OF THE DATA PROVISION

The data provision is mandatory with effect from 1st February 2022 until 31st March 2022.

RECIPIENTS OF PERSONAL DATA

The personal data of the interested parties will be processed by specifically authorized subjects.

DATA RETENTION PERIOD

The storage is not envisaged for the personal data processed for the verifications of the Green Pass.