

## **PRIVACY POLICY “LEASE CONTRACT FOR COMMERCIAL SPACES”**

### **PURSUANT TO ART. 13 OF EU REGULATION NO. 679/2016**

#### **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 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 the management of the lease contract for commercial spaces owned by the Municipality of Milan and managed by ATM as part of the service contract with the Municipality of Milan for the concession of the services connected with and complementary to local public transport. The legal basis is the execution of a contract of which the interested party is a party or the execution of pre-contractual measures adopted at the request of the same pursuant to art. 6, paragraph 1, letter b) of EU Regulation No. 679/2016.

#### **CATEGORIES OF DATA PROCESSED**

Data processed are ordinary personal data: first name, last name, fiscal code.

#### **DATA DISCLOSURE**

Personal data are processed by personnel authorized pursuant to Article 29 of the GDPR and Article 2-quaterdecies of the Italian Data Protection Code, by the data controller and may be communicated to companies that provide goods and/or services related to the processing. By way of example, and without limitation, entities providing rental services.

#### **METHODS OF PROCESSING**

The processing of personal data may also be carried out through automated and computerized procedures, by means of the operations of collection, recording, organization, storage, consultation, processing, alteration, selection, retrieval, comparison, use, interconnection, restriction, disclosure, erasure and destruction of the data. Furthermore, the data are processed solely for the purposes indicated above, in accordance with the principles of lawfulness, fairness, transparency, accuracy, integrity and confidentiality established by the applicable legislation.

#### **DATA TRANSFER**

No transfer of the personal data collected for the purposes set out above to third countries outside the European Economic Area or to international organizations is currently envisaged. Should such transfer become necessary, it will be carried out based on an adequacy decision pursuant to Article 45 of the GDPR and in compliance with the appropriate safeguards provided for under Article 46 of the GDPR.

#### **DATA RETENTION PERIOD**

The data will be kept for ten years from the expiration of the lease contract, except in the event of a dispute in the presence of which the data will be kept until the judgment becomes final for all the degrees of judgment provided for by the applicable judicial system.

#### **PROVISION OF DATA**

The provision of personal data is mandatory for the above-mentioned purpose, and any refusal to provide such data may result in the impossibility of entering into a lease agreement for a commercial space.

## **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:

- right of access to your personal data and all information on the processing carried out;
- right to rectification of inaccurate personal data and integration of incomplete data;
- right to erasure ('right to be forgotten');
- right to limit the processing of your personal data;
- right to data portability;
- right to object to the processing of your 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.

Should the data subject believe that their rights have been infringed, they are entitled to lodge a complaint.

For further information, we invite you to consult the website of the Italian Data Protection Authority – [www.garanteprivacy.it](http://www.garanteprivacy.it) – where a dedicated section on these rights is available.

## **METHODS FOR EXERCISING RIGHTS**

You may exercise your rights at any time by:

- sending a registered letter with return receipt to the address of Data Controller;
- sending an email to: [protezionedatipersonali@atm.it](mailto:protezionedatipersonali@atm.it)