

PRIVACY POLICY “BOOKING PLATFORM FOR KEY ACCOUNT”

PURSUANT TO ART. 14 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

PURPOSE OF THE PROCESSING AND LEGAL BASIS

The purpose of the data processing is to schedule an appointment at ATM's 'Key Account' service desk, for the delivery/replacement of subsidized season tickets and/or for handling information requests.

The legal basis is a legitimate interest pursuant to art. 6, paragraph 1, letter f, of EU Regulation no. 679/2016.

CATEGORIES OF DATA PROCESSED

Data processed are ordinary personal data: first name, last name, telephone number, email address, 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 (e.g.: designated carrier entrusted with the delivery of the pass).

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 until the booking is processed and for a maximum of one year.

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 inability to use the service.

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 – 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