

PRIVACY POLICY

pursuant to European Regulation 2016/679 relating to the protection of natural persons with regards to processing of personal data, as well as the free sharing of such data and in accordance with current Italian legislation

Società per azioni Esercizi Aeroportuali S.E.A., having established its registered office in Segrate (Milano) – 20054 – at Milano-Linate Airport, (afterwards named “**Company**”), during SEA Supplier platform registration phase, as well as for the subsequent qualification and/or participation into tenders, processes and manages users personal data freely provided by the interested parties, pursuant to articles 4, n. 7) and 24 of EU Regulation 2016/679 of April, 27th 2016 regarding natural persons Data Protection with regards to the processing of personal data (afterwards named “**Regulation**”), as well as in compliance with current Italian legislation.

By Personal Data Protection is meant any operation or set of operations, carried out with or without the aid of automated processes and applied to personal data or sets of personal data, even if not recorded in a database, such as the collection, recording, organisation, structuring, storage, processing, selection, blocking, adaptation or modification, retrieval, consultation, use, communication by transmission, dissemination or any other form of provision, comparison or interconnection, limitation, cancellation or destruction.

The Company will therefore proceed, in accordance with the Regulation and the Italian legislation in force, with the relevant data processing for the purposes listed below, manually done and/or with the support of IT or telematic means.

1. Purpose and legal basis of data processing

Data are acquired and processed in compliance with the rules established by the Regulation and the Italian legislation in force for purposes related to the management of the online tendering and qualification process, as well as the possible establishment of a contractual relationship, upon consent of the interested party (“**Primary Purposes**”).

2. Communication and dissemination of personal data for the pursuit of the Primary Purposes of data processing.

Data may be communicated to third parties when communication is mandatory by law, including the scope of prevention/repression of any illicit activity. Furthermore, with reference to article 13, paragraph 1, letter (e) of the Regulation and the Italian legislation in force, the data may be communicated exclusively for the pursuit of the Primary Purposes to the employees/collaborators/consultants of the Company, as well as to third-party companies whose collaboration the Company adopts to pursue Primary Purposes. The updated list of external responsables is available at Company's headquarters offices.

Data will not be disclosed, or personal data will not be disclosed to the public or, in any case, to an indeterminate number of subjects.

3. Mandatory or optional nature of providing data for the pursuit of the purposes of data processing

3.1 The provision of data to the Company is mandatory only for those data for which there is a regulatory obligation in this sense. Any refusal to provide such mandatory data could force the Company to obtain them from third parties (where lawfully possible) or result in the failure to pursue the Primary Purposes. Any refusal to provide data for which there is no obligation to provide data under the law, but which are strictly functional to the pursuit of the Primary Purposes, does not entail any consequences in relation to ongoing relationships, except for the eventual impossibility of follow up on operations connected to such data or the impossibility of pursuing the Primary Purposes.

3.2 In any case, even where the interested party has given consent to authorize the Company to pursue the purposes indicated above, he or she will remain free to revoke it at any time.

We inform you specifically and separately, as required by the art. 21 of the Regulation, where applicable, that the interested party has the right to object at any time to the processing of personal data concerning him/her and carried out for these purposes and that if the interested party objects to the processing, the personal data can no longer be subject of processing for these purposes.

4. Transfer of personal data to countries outside the European Union.

The data collected and processed are not transferred to companies or other entities outside the EU territory.

5. Data retention timing

With reference to the personal data processed to pursue the Primary Purposes of data processing, they will be kept in compliance with the principle of proportionality and until the purposes of the processing have been achieved, and in any case for a period not exceeding 5 years, unless what is stated in terms of prescription by Italian fiscal and civil law.

6. Data owner and processing controller

The identification details of the company responsible for data processing are as follows:

Società per azioni Esercizi Aeroportuali S.E.A., with registered office in Segrate (Milan) – 20054 – at Milan-Linate Airport.

7. Data Protection Officer (DPO)

It is possible to contact the Data Protection Officer, also to exercise the rights of interested parties pursuant to articles. 15-22 of the Regulation, by sending an email to privacy@seamilano.eu

8. Rights of the interested party

With regards to data processing, the interested party has the right to exercise the rights reported into articles from nr. 15 to nr. 22 of the European Regulation Nr 2016/679, reproduced in reduced form in Annex A within this document.

The exercise of rights is not subject to any formal constraints and is free.

Annex A European Regulation regarding Personal Data Protection from art. nr. 15 to art. nr. 22

Pursuant to European Regulation Nr. 2016/679 articles from nr. 15 to nr.22, the interested party has the right to obtain from the data protection owner the rectification, integration or cancellation (so-called “right to be forgotten”) of his personal data, the right to obtain the limitation of data management and the right to obtain limitation to data portability, the right to oppose to the processing of personal data, including profiling and, finally, the right to lodge a complaint with the Guarantor Authority.

Courtesy Translation: in case of discrepancy between the Italian language original text and the English language translation, the Italian version shall prevail