

PASSENGERS PRIVACY

Information document pursuant to and for the purposes of Article 13 Reg. (UE) 2016/679.

In compliance with what is stated in Regulation (EU) 2016/679 (European Regulation for the Protection of Personal Data). Hereby we provide you with the necessary information concerning the processing of personal data you provided. This statement is also made pursuant to art. 13 of Regulation UE 2016/679 (European Regulation for the Protection of Personal Data).

Data owner

Avionord Srl, with registered office in Via dell'Aviazione 65 – 20138 Milan (MI), in the person of its temporary legal representative.

Contact information: info@avionord.com; tel.: 02 7020201

<i>Purpose of the processing</i>	<i>Legal basis</i>	<i>Data Retention Period</i>
<p>Treatment required under a contract or for the purpose of concluding a contract and related administrative and pre-contractual activities.</p> <p>- SOFTSPAM: promotional and informational activity, newsletters by e-mail to the e-mail address provided during the sale, concerning the same type of product and/or service (Soft Spam) analogous to the product/service object of the sale.</p>	<p><i>Contract</i> art. 6 Point b) GDPR treatment is necessary to pursue the execution of a contract of which the person concerned is a party or to the execution of pre-contractual measures adopted at the request of the same.</p> <p><i>Legitimate interest</i> art. 6 Point f) and considering 47: processing is necessary for the pursuit of the legitimate interest of the data owner or third parties, provided that the interests or the fundamental rights and freedoms of the data subject that require the protection of personal data do not prevail, taking into account the reasonable expectations nourished by the concerned based on your relationship with the data owner.</p>	<p>10 years or different legal obligation Art. 2220 Italian Civil Code</p> <p>Until your opposition</p>

RECIPIENTS OR CATEGORIES OF RECIPIENTS OF DATA – The personal data provided will be communicated to recipients, who will process the data as data owners (art. 28 of EU Reg. 2016/679) and/or as natural persons acting under the authority of the Owner and Manager (art. 29 of EU Reg. 2016/679), or operate in total autonomy as separate data owners for the above mentioned purpose. Precisely, the data will be communicated to: -- persons who provide services for the management of the information system and communication networks (including e-mail); - firms or companies in the context of assistance and consultancy relationships; - competent authorities who enforce the law and/or regulations promulgated by public bodies, on request.; - in the case of administrative accounting purposes, the data may possibly be

transmitted to commercial information companies for the assessment of solvency and payment habits and/or to subjects for credit recovery purposes.

TRANSFER OF DATA TO A THIRD COUNTRY AND/OR INTERNATIONAL ORGANISATION AND GUARANTEE

Personal data provided will not be transferred abroad to non-EU Countries.

NATURE OF THE PROVISION AND REFUSAL – The provision of data for the purposes indicated in this information:

- conclusion of the contract: it is necessary for the purpose of stipulating the contract between the parties and for the purpose of managing the fulfilment of administrative/accounting obligations always with respect to the contract in place, the refusal provide the data will not allow the conclusion of the contract. The owner also informs that any non-communication or incorrect communication, of one of the information, has emerging consequences: 1) the impossibility for the owner to guarantee the respect of the contractual agreements related to the data processing; 2) the possible missing correspondence of the data processing results with the obligations required by the fiscal, administrative legislation or labour to which the processing is aimed
- Soft Spam: with regards to the Soft Spam activity, the data subject shall have the right to oppose the processing of data at any time. Opposition even after these e-mail communications will not affect the contract.

RIGHT OF DATA SUBJECTS – Data subjects have the right to obtain from the Data Owner, in the cases provided, access to personal data and the correction or cancellation of the same or the limitation of the processing that concerns them or to oppose the processing (articles 15 and following of EU Regulation 679/2016). You may exercise your rights as provided for in articles 15, 16, 17, 18, 19, 20, 21, 22 of the UE Regulation 2016/679, by contacting the data Owner by sending an email to the address privacy@avionord.com.

You may oppose the processing based on legitimate interest at any time. You have the right, at any time, to ask the Data Owner for access to your personal data, rectification, cancellation of the same, limitation of processing. Moreover, in the foreseen cases, you have the right to oppose, at any time, the processing of your data (including automated processing, ex. profiling), as well as to withdraw the consent provided without prejudice to the lawfulness of the processing based on consent before the withdrawal. Without prejudice to any other administrative and judicial appeal, if you believe that the processing of data concerning you violates the provisions of EU Reg. 2016/679, pursuant to art. 15 point f) of the aforementioned EU Reg. 2016/679, you have the right to complain to the Data Protection Supervisor and, with reference to art. 6 paragraph 1, point a) (consent) and art. 9, paragraph 2, point a) (consent for single purpose particular data), has the right to withdraw the consent given at any time. In the foreseen cases, you have the right to the portability of your data and in this case the Data Owner will provide you with a personal data concerning you in a structured format, commonly used and readable, by automatic device.

Last update: 07.11.2018