



**PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA FOR  
AIRLINES, SUB-CONCESSIONAIRES AND OTHER CLIENTS**

**EU 2016/679**

In relation to the processing of personal data provided, please note that:

**1. Data Controller**

The Data Controller is SAVE S.p.A. with registered office in Via Galileo Galilei n. 30/1, Venezia Tessera (VE) Italy, VAT Code IT 02193960271 (hereinafter referred to for the sake of brevity as 'the Company' or 'the Data Controller'), which has also appointed the Data Protection Officer (DPO) whose contact details are: [dpo@grupposave.com](mailto:dpo@grupposave.com).

**2. Type of data processed, Purpose and legal basis of the Processing**

The following personal data will be collected and processed:

- (i) personal data of a common nature (personal data, contact data, job title and company role);
- (ii) data relating to flights and passengers (in case of management of claim and reports from or addressed to airlines or handling companies);
- (iii) special categories of personal data and data relating to offences and convictions (in case of verifications required by law).

The Data Subjects are: independent contractors, employees, collaborators, contact persons, delegates, attorneys, members of boards of auditors and administrators, shareholders, also cohabiting family members in case of data under point (iii).

Such Data Subjects belong or are related to Airlines, Sub-concessionaires of airport areas and other clients of the Data Controller or its subsidiaries or controlling company.

Above mentioned personal data are processed for the following purposes: A) pre-contractual and implementation purposes of the contractual or procurement relationship; B) administrative, fiscal and accounting purposes fulfilling legal obligations for invoicing and managing contractual relationships; C) management of passengers' claims; D) litigations and credit management; E) sending communications regarding Airport activities; F) carrying out activities to improve airport services.

The legal basis of the data processing is therefore: fulfilment of contractual obligations for the purposes referred to in point (A); legal obligations for the purposes set out in points (B); the legitimate interest of the Data Controller for the purposes referred to in letters from (C) to (F).

Other personal data of Data Subjects hereinabove, including data collected through the CCTV video surveillance system, can be processed by the Company in the event that the same Data Subjects are also Airport Operators at the Venice Marco Polo Airport. In such cases, personal data, purposes and legal basis are reported into Data Controller's privacy notice for "Airport Operators" available for consultation on the website <https://my.veneziaairport.it> (section Privacy).

**3. Communication of data to third parties - Recipients of data**

The Company may communicate the processed data for the above purposes to: (i) internal corporate subjects; (ii) professionals, consultants and their delegates, service companies, data-processing companies and consultancies/firms, control and certification bodies, insurance companies and brokers, banks and credit institutions; (iii) other airport operators; (iv) public authorities and bodies (eg. ENAC) and Law-and-Order forces; (v) Airport systems and facilities maintenance company; (vi) SAVE Group companies.

**4. Transfer of data to third countries**

The processed data will not be transferred by the Data Controller to third countries. However, in the event of any transfer of data to third countries, such transfer will take place in accordance with the regulations in force at the time regarding the transfer of data to third countries.

#### **5. Processing method, period and data retention criteria**

The data will be processed in paper and digital formats. The data will be processed by the Data Controller for the period necessary for the performance of the above purposes, and at the end of which for the further statutory prescription period relating to the retention of contracts and administrative data and/or for defence in court (ten years from the last use and/or event interrupting case time-barring).

#### **6. Data Submission**

The submission of data is mandatory for the execution of the contractual relationship and purposes of law. Failure to submit data will make it impossible to pursue the purposes indicated above.

#### **7. Rights of the Data Subject, Withdrawal of Consent and Complaint to the Control Authority**

The Data Subject has the right at any time to request access to, rectification, erasure or limitation of their personal data, to object to the processing of their personal data and to exercise their right to the portability of their personal data.

In any case, the Data Subject may, at any time, revoke any consent given to the processing of their data without prejudice to the lawfulness of the processing based on the consent given prior to revocation.

In the event of an alleged breach, if the conditions for such a breach are met, the Data Subject may also lodge a complaint with a data controller in the EU Member State in which they have their habitual residence, or in the EU State in which they work or in which the breach took place.

#### **8. Automated profiling and decision making**

The processing is not carried out using automated decision-making processes (e.g. profiling).

#### **9. Contacts and requests**

In order to know the complete list of the Privacy Contact of the processing appointed for each area and activity and of the Persons in charge/to have more information about the transfer of data to non-EU countries, the mechanisms and safeguards for the transfer of data pursuant to Art. 44 and ff GDPR/ to exercise the revocation of any consent given/ to exercise their rights (access, rectification, cancellation, limitation, opposition, portability) you can submit a request to the email: [privacy@grupposave.com](mailto:privacy@grupposave.com)