

**INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT ART. 13 AND 14 OF REGULATION (EU) 2016/679
("GDPR") – PROVISION OF SERVICES TO AIRPORT OPERATORS**

 DATA CONTROLLER
The Data Controller is: S.A.C.B.O. S.p.A. , Via Orio al Serio 49/51 – 24050 Grassobbio (BG) e-mail: privacy@sacbo.it

 DATA PROTECTION OFFICER (DPO)
The Data Controller has appointed a Data Protection Officer (DPO): Partners4Innovation , c/o SACBO S.p.A. e-mail: dpo@sacbo.it

PERSONAL DATA PROCESSED	 SOURCE OF DATA
The Data Controller processes personal data in the context of provision of services to airport operators.	Data can be collected from the data subject or acquired by applicant company.
 Common data: by way of example and depending on the service: personal identification data, contact details, professional data and data relating to the possession of qualifications of various kinds; additional information required for application of airport access passes: the details of the employment or service contract, vehicle documentation and other personal data provided by the applicant.	

 DATA PROCESSING PURPOSES	 LEGAL BASIS	 PERIOD
The data provided by you when filling in the relevant forms will be processed by the Company for purposes related to requests for services connected with the professional activity carried out by airport operators, requested, promoted and/or managed by SACBO S.p.A., possibly also in cooperation with third parties, including enrolment in training courses, requests for airport driving permits and access badges , and/or the registration of accounts on portals used to manage such services.	Performance of a contract or the taking of pre-contractual measures at the request of the data subject.	Duration of the contract and, after termination, for the ordinary statutory limitation period of 10 years.
In relation to the service for the issuance of permanent / visitor airport access badges, vehicle permits and airside driving certification , the data provided will also be processed to allow: - authorised access to sterile airport areas; - movement within such sterile areas of the airport grounds; - checks and controls, including post-event checks, carried out by the Data Controller or by other authorised authorities.	Compliance with a legal obligation to which the Company is subject (National Civil Aviation Security Programme) and applicable regulations (Commission Regulation (EU) No. 2015/1998 and Commission Decision 8005/2015; for driving certifications: Regulation (EU) No. 139/2014).	Data relating to the request will be retained for one year from the submission of the request. Data relating to accounts registered on the "badge management portal" will be retained for one year from the last access or update of information. Access records will be retained for a period of 2 years from the date of the last access.
To finalise the purchase of the requested service, confirm the executed order, issue invoices and, more generally, for the administrative management of such services.	Compliance with a legal obligation to which the Company is subject.	For the duration of the contractual relationship and, after termination, for the ordinary statutory limitation period of 10 years, in addition to any retention periods required for accounting and tax documentation.
Direct marketing (promotional and commercial communications relating to services offered by the Data Controller), event notifications, newsletters, as well as market analysis and statistical surveys.	Explicit consent (which is optional and can be withdrawn at any time).	Data will be processed for marketing purposes for a maximum of 24 months from the date consent is granted. The data will be retained for a further 2 years, for the sole purpose of handling any disputes.
Where necessary, to establish, exercise or defend the rights of the Data Controller in judicial and out-of-court proceedings .	Legitimate interests pursued by the Controller.	For the entire duration of the dispute, until the expiry of the time limits for appeal and/or until the judgment becomes final and enforceable.
Once the aforementioned retention period has lapsed, the data will be destroyed, erased or anonymized, in accordance with technical deletion and backup procedures.		

**DATA PROVISION**

The provision of personal data is mandatory for the provision of the service. Failure to provide such data will prevent the Company from fulfilling the data subject's request and/or related obligations.

An exception applies to data processed for marketing purposes, for which consent is optional and may be withdrawn at any time.

**PARTIES AUTHORIZED TO PROCESS DATA**

Data may be processed by employees in company departments who are responsible for carrying out the activities outlined above and have been authorized to process the data and have received suitable operating instructions.

**DATA RECIPIENTS**

Data may be communicated to external parties operating as data controllers (for example, supervisory bodies and authorities and public or private parties in general authorized to request data) or may be processed, on behalf of the Controller, by external parties appointed as Data Processors, who are given adequate operating instructions (e.g. website hosting service providers, e-learning platform providers and/or service management portal providers, etc.).

**DATA SUBJECTS' RIGHTS – COMPLAINT TO THE SUPERVISORY AUTHORITY**

By contacting the Company via email privacy@sacbo.it, data subjects may request from the Controller access to their personal data, its rectification, completion or deletion, as well as the restriction of processing in the cases provided for under art.18 of the GDPR and the restriction of processing, on grounds relating to their particular situation, where such processing is based on the legitimate interest of the Controller.

Furthermore, in the case where processing is based on consent or a contract and carried out with automated tools, data subjects have the right to receive the personal data in a structured, commonly used and machine-readable format, and to transmit the data to another data controller without obstruction.

Data subjects have the right to withdraw their given consent at any time, as well as to object to the processing carried out to pursue the legitimate interests of the Data Controller.

Data subjects have the right to lodge a complaint with the competent supervisory authority.