













INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT ART. 13 AND 14 OF REGULATION (EU) 2016/679 (“GDPR”) – PASSENGERS WITH REDUCED MOBILITY (PRM)

	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). e-mail: dpo@sacbo.it		
	PERSONAL DATA PROCESSED	
The Data Controller processes personal data in the context of the activity of managing the assistance for Passengers with Reduced Mobility (PRM).		
	Common data: Passenger’s first and last name; boarding pass data (number, flight details, date and time); service booking details; personal/contact details of third parties (delegate/companion/guardian); details of the operator assisting the passenger (first name, last name, ID number).	
	Special categories of processed personal data: Type of assistance requested according to the IATA classification; no additional information revealing the data subject’s health conditions is requested.	
	SOURCE OF DATA	
Personal data of PRMs are collected by SACBO through the airline company with which the data subject books the flight and the service, and subsequently directly from the data subject, or from a delegate/companion/guardian, at the airport (through presentation and scanning of the boarding card or through integration/modification of the service directly at the airport).		
	DATA PROCESSING PURPOSES	
	LEGAL BASIS	
	PERIOD	
Personal data will be processed for the purpose of managing the assistance.	Compliance with a legal obligation to which the Controller is subject (Reg. (CE) n. 1107/2006).	The data will be retained for 5 years after the provision of the service, unless there is a need to retain the data for a longer period in the event of pending litigation and/or a complaint.
If necessary to ascertain, exercise and/or safeguard Controller rights in legal proceedings.	Legitimate interests pursued by the Controller.	For the duration of any litigation, until completion of the terms of implementation outlined in legal remedies and/or up to the expiration of the terms for appeal.
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	
Provision of the data related to the above-mentioned purpose is mandatory. Therefore, refusal to provide the data makes it impossible to perform the service.		
	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 (for example companies that support the provision of the service, IT system providers for service management).		
	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.		