

Contact Center service
Personal Data Protection Policy Notice
(pursuant to Article 13 of Regulation (EU) no. 679/2016)

Before acquiring your personal data for handling your requests via the Contact Center service, Mercitalia Rail S.r.l. invites you to carefully read the personal data protection policy.



I. Data Controller and Data Protection Officer

This section provides details concerning the subjects responsible for the procedure

- Mercitalia Rail S.r.l., the **Data Controller**, represented by the Chief Executive Office pro-tempore and the registered office of which is at Piazza della Croce Rossa, 1 – Roma, may be contacted at the e-mail address titolaretrattamento@mercitaliarail.it.
- The **Data Protection Officer** may be contacted at the email address protezionedati@mercitaliarail.it.



II. Types of personal data

This section indicates the types of data requested from you

The personal data subject to processing are included in the following categories:

Personal data acquired directly from the Data Subject:

- **Common:** personal details (name, surname), contact details (e-mail, telephone).
- **Other personal data:** data acquired during phone recording.



III. Purpose of Data Processing

This section indicates the purpose of the processing of your data

The data you are asked to provide via the Contact Center service are collected for the purpose of providing you with the service you requested via the telephone channels made available by Mercitalia Rail S.r.l.

In particular, your data will be processed for the following **purposes**:

- a. handling your requests for information and/or assistance received via the Contact Center service (legal basis: contractual);
- b. quality control and verification of the effectiveness of the assistance services offered via the Contact Center (legal basis: legitimate interest).

Conferment of the data necessary to pursue the purpose provided for under points a. is ‘mandatory’ and any opposition in this regard may result in a situation in which it is impossible for Mercitalia Rail S.r.l. to follow up on your telephone requests.

Acquisition of the data necessary to pursue the purpose referred to under point b. is ‘optional’ and it is necessary to manage your requests and control the quality of the service provided. During the telephone call, you will be informed in advance about the registration by means of a brief information notice issued by a recorded voice. If you do not interrupt the call, the principle of ‘continuation of the call/assent to the recording’ is deemed to have been manifested.



IV. Data recipients

This section indicates the subjects who will receive and process your personal details

To pursue the objectives described above your personal data will be processed by the following subjects:

➤ **Subjects related to Mercitalia Rail S.r.l.**

Your personal data will be made available only to those subjects who, within the Company, require the same to perform duties which are assigned to them or are related to the position that they hold. These subjects will have been suitably trained in order to prevent any loss, unauthorised access or any unauthorised processing of your data.

Furthermore, the data may be used by the following categories of subjects who perform instrumental activities on behalf of Mercitalia Rail S.r.l.:

- **Service companies** (including IT) to which activities of information systems management are entrusted.
- **Companies within the same Group** to which Mercitalia Rail S.r.l. belongs, for the management of information systems.

These companies act as **Data Processors** on behalf of Mercitalia Rail S.r.l. and have signed a specific contract, which carefully regulates the processing entrusted to them and establishes obligations regarding data protection.

➤ **Areas not related to Mercitalia Rail S.r.l.**

Your personal data may also be transmitted to other independent Data Controllers in accordance with legal provisions or regulations (e.g., Public Administration Entities, Social-Security Institutes, etc.) or on the basis of the specific consent you have provided. These subjects will process your data as indicated in their privacy policy notices, which may be accessed and viewed.

An updated list of subjects who will receive the personal data is available and may be requested by forwarding an e-mail message to the following address protezionedati@mercitaliarail.it.



V. Data disclosure

This section presents our warranty that your data will not be disseminated

Your personal data will never be published, presented or made available to any unspecified subjects.



VI. Data retention

This section provides an indication of the period of time during which we will store your data

The personal data you have provided to us will be preserved for the period of time necessary to handle your requests and in any case for a period no longer than one year after acquisition.



VII. Rights of the Data Subjects

This section provides details on your guaranteed rights

EU Regulation 2016/679 (articles 15 to 22) grants interested parties the exercise of specific rights. In particular, in relation to the processing of their personal data covered by this information, the interested party has the right to ask Mercitalia Rail S.r.l. for:

- **Access:** you may request confirmation as to whether or not data concerning you is being processed, along with further clarification of the information referred to in this Policy;
- **Rectification:** you may ask to rectify or integrate the data you have provided if the details are inaccurate or incomplete;
- **Erasure:** you may request that your data be deleted if it is no longer necessary for our purposes, if your consent is withdrawn or you object to processing, if processing is unlawful or if there is a legal obligation to erase;
- **Restriction of processing:** you may request that your data only be processed for the purpose of retention, with the exclusion of other processing operations, for the period necessary to rectify your data, in the event of unlawful processing for which you object to the erasure, whereby you must exercise your rights in court and the data stored by us may of use to

you and, finally, if you object to processing and a check is being carried out as to whether our legitimate reasons prevail over your own;

- **Objection:** at any time, you may object to the processing of your data, except whereby legitimate grounds for processing persist and which override your own, for example for the exercise or defence of our rights in court;
- **Portability:** you may request to receive or to have your data transmitted to another data controller indicated by you, in a structured, commonly-used and machine-readable format.

At any time, you can ask to exercise your rights by contacting the **Data Protection Officer** who can be contacted at the following email address: protezionedati@mercitaliarail.it.

Furthermore, the interested party has the right to lodge a complaint, if they believe that their rights have been violated, to the Supervisory Authority, which in Italy is the **Garante per la Protezione dei Dati Personali**.