

## **LOYALTY PROGRAM PRIVACY POLICY**

### **Privacy Notice on the processing of personal data**

### **Website and loyalty program pursuant to Articles 13 and 14 of EU Regulation No. 2016/679 (“GDPR”)**

Italia Loyalty S.p.A., with its registered office at Piazza della Croce Rossa, No. 1 – 00161 Rome (RM), in its capacity as data controller (hereinafter, “**Italia Loyalty**” or the “Data Controller”), places the highest priority on the security and confidentiality of the personal data of users of the website [www.italialoyalty.com](http://www.italialoyalty.com) (hereinafter, the “**Website**”) (each, a “User” and collectively, the “Users”), as well as of individuals enrolled in the loyalty program (hereinafter, the “**Program**” or the “**Loyalty Program**”) (each, a “Member” and collectively, the “Members”). Through this Privacy Notice, Italia Loyalty provides information on the processing of personal data (hereinafter, the “Personal Data”) in connection with the use of the Website and with registration and/or participation in the Program.

This Privacy Notice does not apply to third-party websites (hereinafter, the “**Partners**”) that may be accessed through links on the Website. Users are encouraged to review the privacy notices of such third-party websites to understand how their personal data is processed. Any links to Partner websites are provided solely for information purposes. Partners act as independent data controllers, processing personal data for their own purposes as described in their respective privacy notices.

### **1. DATA CONTROLLER AND DATA PROTECTION OFFICER (“DPO”)**

The Data Controller of the personal data of Website Users and Members is: Italia Loyalty S.p.A., with registered office in Piazza della Croce Rossa, no. 1 - 00161 Rome (RM).

Italia Loyalty has appointed a Data Protection Officer (“DPO”), in accordance with Article 37 of the GDPR, who can be contacted at the following email address: [dpo@italialoyalty.com](mailto:dpo@italialoyalty.com).

### **2. HOW PERSONAL DATA IS COLLECTED**

When browsing the Website, Italia Loyalty collects Personal Data relating to Users, either voluntarily provided by them or automatically collected during the normal operation of the Website.

In particular, the computer systems and software procedures used to operate the Website acquire, during their normal operation, some Personal Data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified individuals, but by its very nature could, through processing and association with data held by third parties, allow Users to be identified. This category of data includes the IP addresses of the computers used by Users who connect to the Website, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system used. This data is used for the sole purpose of obtaining anonymous statistical information on the use of the Website and to check its correct functioning and is deleted immediately after processing. The data could be used to ascertain responsibility in the event of any computer crimes against the Website.

The Website also uses cookies and other tracking technologies. For further information and to manage your preferences at any time, please refer to the Cookie Policy available at the following link, as well as the relevant control panel accessible under “Cookie Preferences” in the footer of the Website.

The Data Controller collects and processes, for the purposes indicated in Section 3 below, the Personal Data voluntarily provided by Members in the following circumstances:

- (i) when registering for the Program via the Website;
- (ii) when using the Program’s services or when purchasing services or products from Partners;
- (iii) when interacting with Italia Loyalty by electronic means (e.g., email) or through the call centre services indicated in the “Contacts and Services” section of the Website.

As part of the “Family & Friend” initiative, Italia Loyalty also collects and processes the Personal Data of children aged between 2 and 13 years, provided directly by their parent or legal guardian.

If a User or Member provides Personal Data on behalf of another individual, they must first ensure that the individual concerned has read this Privacy Notice.

Members are encouraged to help keep their Personal Data accurate and up to date by notifying us of any changes or by accessing their personal area on the Website.

### 3. PURPOSES OF PROCESSING, LEGAL BASES, CATEGORIES OF PERSONAL DATA AND RETENTION PERIODS

The Personal Data of Users and/or Members is processed by the Data Controller for one or more of the purposes set out below, on the legal bases specified in each case.

A	Purpose of processing	Types of data processed	Legal basis and provision	Retention period
1	<p><b>Operational management of enrolment and participation in the Program, including related administrative and accounting purposes</b></p> <p>Italia Loyalty collects and processes Members’ Personal Data in order to (i) process and manage enrolment requests to the Program; (ii) manage the accumulation and redemption of miles (“earn &amp; burn”) through Program services and/or the purchase of Partner</p>	<p>- <b>Personal and contact details:</b> first name, last name, date of birth, gender, postal address, telephone number, mobile phone number, e-mail address (personal or business), loyalty card number.</p> <p>- <b>Loyalty profile data:</b> login details and information entered in the personal account (e-mail and password).</p> <p>- <b>Membership status data:</b> information regarding to</p>	<p>Execution of a contract to which the Member is a party or in order to take steps at the Member’s request prior to entering into a contract pursuant to Article 6(1)(b) of the GDPR.</p> <p>The provision of the Personal Data requested in the Program registration form, marked with an asterisk (*), is mandatory as it is required for managing the Member’s enrolment and participation in the Program and for purposes strictly connected</p>	<p>For the entire duration of the Program and until 30 June 2027, without prejudice to the need for a longer retention period specified for purpose No. 6.</p>

<p>services or products; (iii) manage and deliver rewards; (iv) create and maintain the loyalty profile that enables Members to access the reserved area of the Website; (v) create and manage login credentials for the personal area of the Website; (vi) send service communications relating to the Member's status, including notifications regarding potential expirations, benefits and the closure of the Program; (vii) perform any contractual obligations connected with enrolment, participation or closure of the Program; and (viii) share Members' Personal Data with Program Partners to enable the crediting and/or use of miles.</p>	<p>membership level (Club Ulisse, Club Freccia Alata or Club Freccia Alata Plus), miles accumulated or redeemed and rewards requested.</p> <p>- <b>Other Personal Data:</b> information voluntarily provided by the Member, including company name, professional status, or other personal information.</p>	<p>thereto. Failure to provide such data will prevent Italia Loyalty from processing the request for registration and participation in the Program.</p>	
<p><b>2 Managing and responding to information requests submitted by User or Member via the Website or call centre</b></p> <p>Italia Loyalty collects and processes the Personal Data of Users or Members in order to manage and respond to their enquiries or requests for information, including those relating to activities carried out after the closure of the Program.</p>	<p>- <b>Personal and contact details:</b> first name, last name, e-mail address (personal or business), loyalty card number.</p> <p>- <b>Other Personal Data:</b> information provided by the Member in the text of the request, which may include details relating to their professional situation, telephone number or other personal information.</p>	<p>Execution of a contract to which the Member is a party or in order to take steps at the Member's request prior to entering into a contract pursuant to Article 6(1)(b) of the GDPR.</p> <p>The provision of Personal Data is necessary because, without it, Italia Loyalty will not be able to manage and respond to the User's or Member's request.</p>	<p>Personal Data will be stored in accordance with the retention period specified for purpose No. 1.</p>

3	<p><b>“Generic” marketing</b></p> <p>Subject to consent, Italia Loyalty will process Members’ Personal Data for marketing and promotional purposes, including to inform them about its services, related offers, discounts, and any other promotional or loyalty initiatives, as well as for market research activities. The Data Controller will also use such data to promote initiatives concerning the sale of services and/or products offered by Program Partners, who act as independent data controllers. In these cases, the processing is carried out directly by Italia Loyalty and does not involve any disclosure of Personal Data to the Partners. For the list of Partners, please click here.</p> <p>Marketing communications may be sent through automated means (such as email, SMS, instant messaging, push notifications, and services or tools provided by social networks and other mass messaging platforms) as well as through traditional channels (e.g., telephone calls with an operator). Members may, at any time, indicate their preferred method of</p>	<p>- Personal and contact details: first name, last name, date of birth, postal address, telephone number, mobile phone number, email address (personal or business), loyalty card number.</p> <p>- <b>Membership status data:</b> information regarding membership level (Club Ulisse, Club Freccia Alata, or Club Freccia Alata Plus), number of miles accumulated or redeemed, and rewards requested.</p> <p>- <b>Purchase data:</b> information relating to purchases of services and/or goods made from Partners, used to create non-profiled clusters.</p> <p>- <b>Other Personal Data:</b> optional information (not marked with an asterisk *) voluntarily provided by the Member when registering for the Program, within their loyalty profile, or when opening and interacting with communications.</p>	<p>Consent pursuant to Article 6(1)(a) of the GDPR.</p> <p>The provision of Personal Data for this purpose is optional. Failure to provide consent does not preclude or otherwise affect enrolment and participation in the Program; however, it will prevent the Member from fully benefiting from the advantages offered by the Program through commercial and marketing communications, or from being informed about additional initiatives, services, discounts and promotions reserved for Members.</p> <p>Consent may be withdrawn at any time.</p>	<p>Personal and contact details, as well as membership status data, will be stored in accordance with the retention period specified under Purpose No. 1.</p> <p>Purchase data and other personal data will be stored for 36 months from the date of collection and, in any event, no later than 31 December 2026.</p>
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<p>contact from among those listed above and may object to receiving promotional communications through all or only some of these channels.</p>			
<p><b>4 Profiled marketing to provide promotional offers tailored to your preferences</b></p> <p>Subject to separate and specific consent, Italia Loyalty will process Members' Personal Data to send commercial communications tailored to their preferences. This is carried out through statistical analysis of the data described above, including interests, habits and purchasing behaviour, as well as analysis of data relating to use of the Website and the Program, in order to create an individual Member profile.</p> <p>Profiled marketing communications may be delivered through automated means (such as email, SMS, instant messaging, push notifications, and tools made available by social networks and other mass messaging platforms) and traditional means (e.g., telephone calls with an operator). Members may, at any time, indicate their preferred method of</p>	<p>- <b>Personal and contact details:</b> first name, last name, date of birth, postal address, telephone number, mobile phone number, email address (personal or business), loyalty card number.</p> <p>- <b>Membership status data:</b> information regarding membership level (Club Ulisse, Club Freccia Alata, or Club Freccia Alata Plus), miles accumulated or redeemed, and rewards requested.</p> <p>- <b>Profiled purchase data:</b> information relating to purchases of services and/or goods made from Partners, including transaction history (type of service/product, quantity, quality, and payment method details).</p> <p>- <b>Member's interests:</b> information provided by the Member regarding travel preferences or other interests, as well as responses to surveys, competitions and/or</p>	<p>Consent pursuant to Article 6(1)(a) of the GDPR.</p> <p>The provision of Personal Data for this purpose is optional. Failure to provide consent does not preclude or otherwise affect enrolment and participation in the Program; however, it will prevent the Member from fully benefiting from the advantages offered by the Program through commercial and marketing communications, or from being informed about additional initiatives, services, discounts and promotions reserved for Members.</p> <p>Consent may be withdrawn at any time.</p>	<p>Personal Data will be stored in accordance with the retention period specified under Purpose No. 3.</p>

	<p>contact from among those listed above and may object to receiving promotional communications through any or all of these channels.</p>	<p>market research initiatives in which they participate.</p> <p>- <b>Other Personal Data:</b> optional information (not marked with an asterisk *) voluntarily provided by the Member when registering for the Program, within the loyalty profile, or when opening and interacting with communications.</p>		
5	<p><b>Communication of data to Trenitalia S.p.A. for its marketing purposes</b></p> <p>Subject to consent, Italia Loyalty will process your personal and contact details by storing them in a dedicated archive and subsequently disclosing them, through secure procedures incorporating appropriate technical safeguards (e.g., encryption or equivalent measures), to Trenitalia S.p.A., which will process them, as an independent data controller, for its own marketing and promotional purposes.</p>	<p>- <b>Personal and contact details:</b> first name, email address (personal or business), loyalty code.</p>	<p>Consent pursuant to Article 6(1)(a) of the GDPR.</p> <p>The provision of Personal Data for this purpose is optional. Failure to provide consent does not preclude or otherwise affect participation in the Program; however, it will prevent the Member from receiving commercial communications from Trenitalia S.p.A.</p> <p>Consent may be withdrawn at any time.</p>	<p>Stored until 31 December 2025.</p>
6	<p><b>Purposes related to the prevention of fraud committed through participation in the Program or through the use of the Website and the services offered by the Program, as well as</b></p>	<p>Depending on the circumstances, the Personal Data collected for Purposes 1 to 4 will be processed.</p>	<p>Italia Loyalty's legitimate interest in protecting its rights and in preventing and/or detecting any fraudulent activities or abuse in the use of the Program or the Website,</p>	<p>For the time necessary to pursue fraud prevention or the protection of rights, and in any case until the relevant judgments become final.</p>

<p><b>to the defence of rights in judicial, administrative or extrajudicial proceedings, and in disputes arising in connection with the Program and the services related thereto</b></p> <p>The Data Controller processes the Personal Data of Users and/or Members to prevent and/or detect fraudulent activities or abuse in connection with participation in the Program, the use of the Website, or the services offered under the Program. Personal Data may also be processed for the defence of rights in judicial, administrative or extrajudicial proceedings, and in the context of disputes arising in relation to the Program or related services, including to bring claims against Users, Members or third parties.</p>		<p>pursuant to Article 6(1)(f) GDPR.</p> <p>No new or specific provision of Personal Data is required, as Italia Loyalty will pursue this additional purpose, where necessary, by processing the data already collected for the purposes outlined above.</p>	
<p><b>7 Purposes related to compliance with obligations under laws, regulations or EU legislation, and with orders/requests from authorities empowered by law and/or supervisory and regulatory bodies</b></p> <p>Italia Loyalty will process the Personal Data of</p>	<p>Depending on the need, the Personal Data collected for Purposes 1 to 6 will be processed.</p>	<p>Compliance with a legal obligation pursuant to Article 6(1)(c) GDPR.</p> <p>The provision of Personal Data for this purpose is mandatory. Failure to provide such data will prevent the Data Controller from fulfilling specific legal obligations.</p>	<p>For the time necessary to comply with legal obligations or to process the request.</p>

<p>Users and/or Members in order to comply with the obligations arising from applicable laws, regulations or EU legislation, as well as with orders or requests issued by authorities empowered by law and/or by supervisory and regulatory bodies.</p>			
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#### **4. HOW PERSONAL DATA IS KEPT SECURE**

The Data Controller adopts a wide range of security measures to ensure the protection, integrity and availability of Personal Data.

All Personal Data is stored on secure servers (or in secure paper archives) owned by the Data Controller or by its suppliers or partners, and is accessible and usable only in accordance with our security standards and policies (or equivalent standards applied by suppliers or business partners).

The Data Controller provides Members with a temporary password (to be changed upon first access) to enable access to the Website, applications or services provided. Members are responsible for maintaining the confidentiality of their account password and for complying with any additional security procedures communicated by the Data Controller.

#### **5. HOW LONG PERSONAL DATA IS STORED**

Italia Loyalty retains Personal Data only for as long as is necessary to fulfil the purposes for which it was collected, or for any other legitimate related purpose, as indicated in Section 3.

Personal Data that is no longer required, or for which there is no longer a valid legal basis for retention, will be irreversibly anonymised or securely destroyed.

Where the processing of Personal Data serves multiple purposes, the data will be deleted or anonymised as soon as the retention period for the final purpose has expired.

#### **6. WITH WHOM PERSONAL DATA MAY BE SHARED**

Personal Data may be accessed by duly authorised employees, as well as by third-party companies appointed, where necessary, as data processors, providing support for the provision of services related to the Program, or by entities acting as independent data controllers (e.g., Program Partners).

Personal Data may also be disclosed, for the purposes specified above, to:

- entities entitled to access Personal Data under European Union law or the laws of the Member State to which the Data Controller is subject;
- banks and payment institutions;

- third parties such as law firms and professional advisers engaged by the Data Controller;
- public authorities and law enforcement agencies;
- companies providing IT infrastructure, IT support and consulting services, and software or website design and development;
- companies providing services to customise and optimise our services, including those for delivering and managing customer care;
- companies providing services for data analysis and development, processing, and market research.

Any disclosure of Personal Data will be carried out in full compliance with the provisions of the GDPR. You may contact us at the addresses indicated in Section 1 to request a list of data processors and other entities to whom Personal Data is disclosed.

Members' Personal Data will not be disseminated to third parties.

## **7. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES**

Personal Data will be processed primarily within the European Economic Area (EEA). However, the use of certain tools by the Data Controller may, on a residual basis, involve the transfer of such data to entities established in countries outside the European Union (EU) or the EEA (hereinafter, "Third Countries"). In all cases, such transfers are carried out in compliance with the provisions of Chapter V of the GDPR.

These external entities will process Personal Data either as independent data controllers or as data processors duly appointed by the Data Controller in accordance with data protection legislation, depending on the role they perform in relation to the processing.

You may contact Italia Loyalty at any time, using the contact details set out in Section 1, to obtain information on the parties to whom your Personal Data is transferred and to receive a copy of the safeguards adopted for such transfers.

## **8. POSSIBLE AUTOMATED DECISION-MAKING**

The Data Controller does not carry out any automated decision-making.

## **9. DATA PROTECTION RIGHTS AND THE RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY**

Where the conditions set out in the GDPR are met, data subjects have the right to request from the Data Controller:

- access to their Personal Data, as provided for in Article 15 GDPR;
- rectification or completion of Personal Data held by us that is considered inaccurate, as provided for in Article 16 GDPR;
- erasure of Personal Data where no legal basis for processing exists, as provided for in Article 17 GDPR;

- restriction of the processing of Personal Data where one of the circumstances under Article 18 GDPR applies;
- a copy of the Personal Data they have provided to us, in a structured, commonly used and machine-readable format, where processing is based on a contractual relationship (the right to data portability), as provided for in Article 20 GDPR;
- withdrawal of consent at any time, where processing is based on consent. Please note that withdrawal of consent will only affect future processing, without prejudice to the lawfulness of processing carried out prior to such withdrawal.

**Right to object:** in addition to the rights listed above, the data subject has the right, at any time and on grounds relating to their particular situation, to object to processing carried out for the purposes of the Data Controller's legitimate interests and to processing for marketing purposes, including profiling insofar as it relates to such marketing.

In the event of the Member's death, the above rights may also be exercised by anyone with a personal interest, or acting to protect the data subject as agent, or for family reasons worthy of protection, pursuant to Article 2-terdecies of Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018 (the "Privacy Code"). The Member may expressly prohibit the exercise, in whole or in part, of the foregoing rights by their successors by sending a written statement to the Data Controller at the addresses below. This statement may be revoked or amended at any time in the same manner.

To exercise the above rights vis-à-vis the Data Controller, the Member (or successor, within the limits set out above) may send a communication to Italia Loyalty S.p.A., Piazza della Croce Rossa, No. 1 – 00161 Rome (RM), for the attention of the Data Protection Officer, or write to: [dpo@italialoyalty.com](mailto:dpo@italialoyalty.com). In both cases, please specify (i) first and last name and (ii) loyalty card number.

If any of the above rights are exercised, we will verify the requester's entitlement and will respond, as a rule, within one month.

If the data subject believes that the processing of Personal Data violates the GDPR, they have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) using the contact details available at [www.garanteprivacy.it](http://www.garanteprivacy.it), or to seek an effective judicial remedy.