

	<b>ANNEX 3</b> <b>PRIVACY NOTICE ON DATA PROCESSING</b> <b>FOR FLIGHT CERTIFICATION REQUESTS</b>	Ref.: <b>PA. 04/2025</b>	
		Version: <b>Rev. 1</b>	Date: <b>12/2025</b>

**PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA**  
pursuant to Article 13 of EU Regulation 2016/679 (GDPR)

Pursuant to current legislation, we wish to inform you that **SAGAT S.p.A.** processes the personal data you provide in accordance with fundamental rights and freedoms, with particular reference to the confidentiality of your personal identity and your right to data protection.

**The Data Controller** is **SAGAT S.p.A.**, with its registered office at Strada San Maurizio 12, Caselle Torinese (TO), which can be contacted at the following email address: [privacy@sagat.trn.it](mailto:privacy@sagat.trn.it), or by sending a letter to SAGAT S.p.A. – Data Controller, Strada San Maurizio 12, Caselle Torinese (TO).

The Company has appointed a **DPO (Data Protection Officer)**, who can be contacted at the following email address: [dpo.privacy@sagat.trn.it](mailto:dpo.privacy@sagat.trn.it) , or by sending a letter to SAGAT S.p.A. – DPO, Strada San Maurizio 12, Caselle Torinese (TO), Italy.

**TYPES OF DATA PROCESSED – PURPOSES OF THE PROCESSING**

The data you provide, such as, by way of example, your personal details, address or other personally identifiable information (first name, surname, residential address) or any other data belonging to special categories – processed pursuant to Article 5 of Italian Legislative Decree No. 33/2013, as amended by Italian Legislative Decree No. 97/2016 – is related to and/or necessary for the handling of your requests for flight certification and the performance of related activities.

**LAWFUL BASIS FOR DATA PROCESSING**

In relation to the aforementioned purpose, the processing is necessary for the performance of a task carried out in the public interest, pursuant to Article 6(1)(e) of EU Regulation Regulation (EU) 2016/679 and Article 2-sexies (2)(a) of Italian Legislative Decree 196/2003.

**PERSONAL DATA PROCESSING METHODS**

Personal data are processed for purposes strictly related to the issuance of the requested certificate, using electronic and paper media, and shall be stored and controlled through the implementation of appropriate preventive security measures aimed at minimising the risks of loss and destruction, unauthorised access, and processing that is not permitted or that deviates from the purposes for which the processing is carried out.

Providing data to our Company is **optional**; however, failure to provide data will make it impossible for us to consider your request or to respond to you.

**The data is not subject to any automated decision-making process.**

**CATEGORIES OF RECIPIENTS**

Personal data shall be processed by **authorised employees** of SAGAT S.p.A. and may be disclosed to companies appointed as Data Processors pursuant to Article 28 of the GDPR, in particular companies that provide technical and IT services or database management and maintenance services to the Data Controller; furthermore, the data may be disclosed to external entities acting as independent data controllers, in particular public authorities, such as the Italian Data Protection Authority, ANAC (the Italian National Anti-Corruption Authority) or judicial authorities.

SAGAT S.p.A. **does not transfer data to a third country** outside the EU or to an international organisation.

## **RETENTION PERIOD**

Please note that, in accordance with the principles of lawfulness, purpose limitation and data minimisation, your data will be retained for a period of time that complies with the rules on access to documents and, in any case, for no longer than 10 years; in the event of legal proceedings, the relevant data will be retained for 10 years from the date on which the judgment becomes final.

## **RIGHTS OF THE DATA SUBJECT**

With regard to the data processed as described in this privacy notice, as a data subject, you have the following rights under the applicable data protection legislation:

- To request access from SAGAT S.p.A. to the data processed (Article 15 of EU Regulation 2016/679);
- To request the rectification of inaccurate personal data concerning you and/or the completion of incomplete personal data (Article 16 of EU Regulation 2016/679);
- To request that your data no longer be processed by withdrawing your consent at any time (Article 13(2)(c), Articles 17 and 21 of EU Regulation 2016/679); (2)(c), Articles 17 and 21 of EU Regulation 2016/679);
- To request the erasure of personal data, but only if: the data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; consent is withdrawn, unless the processing is necessary for the establishment, exercise or defence of legal claims by the data controller; the data are processed unlawfully; or the data must be erased in order to comply with an obligation under EU or Member State law (Article 17 of EU Regulation 2016/679);
- Request restriction of processing in any of the following cases: the data subject contests the accuracy of the personal data and requests restriction for the period necessary for the controller to verify the accuracy of the personal data; the data subject withdraws consent, unless the processing is necessary for the establishment, exercise or defence of legal claims by the controller; the processing is unlawful and the data subject objects to the erasure of the data and requests the restriction of its use instead, even though the controller no longer needs the personal data for the purposes of the processing; the data subject needs the personal data for the establishment, exercise or defence of legal claims (Article 18 of Regulation (EU) 2016/679);
- To request the personal data concerning you in a structured, commonly used and machine-readable format (so-called data portability) (Article 20 of EU Regulation 2016/679).

Please note that you **may exercise the above rights** by writing to [privacy@sagat.trn.it](mailto:privacy@sagat.trn.it) or by sending a letter to SAGAT S.p.A., Strada San Maurizio 12, Caselle Torinese (TO), Italy.

You also have the **right to lodge a complaint** with a supervisory authority if you believe that the processing of your personal data infringes Regulation (EU) 2016/679. The complaint may be lodged with the supervisory authority of the Member State in which the data subject habitually resides or works, or of the place where the alleged infringement occurred (Article 77 of EU Regulation 2016/679).