

INFORMATION 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 the processing of personal data provided by you is carried out by **SAGAT S.p.a.** in compliance with fundamental rights and freedoms, with particular reference to the confidentiality of personal identity and the right to data protection.

The Data Controller is **SAGAT Spa**, with headquarters in Caselle Torinese (TO) - Strada San Maurizio 12, which can be contacted at the following email address privacy@sagat.trn.it or by sending a letter to SAGAT Spa - Privacy Holder, 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 or by sending a letter to SAGAT Spa - DPO, Strada San Maurizio 12, Caselle Torinese (TO).

TYPE OF DATA PROCESSED - PURPOSE OF PROCESSING

The data you provide such as, for example, personal details, address or other personal identification elements (name, surname, residential address) or any other data belonging to particular categories - processed pursuant to Article 5 of Legislative Decree 33/2013, as amended by Legislative Decree 97/2016 - are connected and/or instrumental to the management of flight certification requests made by you and to the performance of related activities.

LEGAL BASIS OF DATA PROCESSING

The processing, in relation to the purpose indicated above, is necessary for the execution of a public interest pursuant to Article 6, paragraph 1, letter e) of EU Reg. EU 2016/679 and Article 2 sexies paragraph 2 letter a) of Legislative Decree 196/2003 (Article 22 et seq. of Law 241/1990 - right of access to administrative documents).

PERSONAL DATA PROCESSING METHODS

Personal data are processed for purposes strictly related to the issuance of the requested certificate, with electronic and paper media and will be kept and controlled by adopting appropriate preventive security measures, aimed at minimising the risks of loss and destruction, unauthorised access, unauthorised processing and processing that does not comply with the purposes for which the processing is carried out.

The provision of data to our Company is **optional**, however, failure to provide data will make it impossible to consider the request, as well as to provide feedback.

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

CATEGORIES OF RECIPIENTS

Personal data will be processed by **authorised employees** of SAGAT S.p.a. and may be communicated to companies, appointed as Data Processors pursuant to Article 28 of the GDPR, in particular companies that provide technical-IT services or management and maintenance services for the Data Controller's databases; furthermore, the data may be communicated to external parties operating as independent data controllers, in particular public authorities, such as the Privacy Guarantor, ANAC or Judicial Authorities.

SAGAT Spa **does not transfer data to a third country**, outside the EU, or to an international organisation.

RETENTION PERIOD

Please note that, in compliance with the principles of lawfulness, limitation of purposes and minimisation of processing, the data will be kept for as long as the Company is subject to retention obligations for tax purposes; in the event of a legal dispute, the relevant data will be kept until the judgment becomes final.

RIGHTS OF THE DATA SUBJECT

In relation to the data subject to the processing referred to in this information, as the data subject you are granted the following rights provided for by current legislation for the protection of personal data:

- Ask SAGAT S.p.a. for access to the information processed (Article 15 of EU Regulation 2016/679);
- Request the correction of inaccurate personal data concerning you and/or the integration of incomplete personal data (Article 16 of EU Regulation 2016/679);
- Request that your data are no longer processed by withdrawing your consent at any time (Article 13, paragraph 2, letter c, 17 and 21 of EU Regulation 2016/679).
- Request the deletion of personal data only if: they are no longer necessary with respect to the purposes for which they were collected or otherwise processed; if the revocation of consent occurs unless the processing serves to ascertain, exercise, or defend a right of the data controller in court; they are processed unlawfully or must be deleted to fulfil an obligation under EU law or national legislation (Article 17 of EU Regulation 2016/679);
- Request the limitation of processing when one of the following hypotheses occurs: the data subject disputes the accuracy of the personal data and requests the limitation for the time necessary for the data controller to verify the accuracy of the personal data; if the withdrawal of consent occurs unless the processing serves to ascertain, exercise or defend a right of the Data Controller in court; the processing is unlawful and the data subject opposes the deletion of the data and requests instead that its use be limited, although the data controller no longer needs it for the purposes of processing, the personal data are necessary for the data subject to ascertain, exercise or defend a right in court (Article 18 of EU Regulation 2016/679);
- Request the personal data concerning you in a structured format, commonly used and readable by an automatic device (so-called portability) (Article 20 of EU Regulation 2016/679).

We inform you that you **can exercise the above rights** by writing to privacy@sagat.trn.it or by sending a letter to SAGAT Spa, Strada San Maurizio n.12, Caselle Torinese (TO).

You also have the **right to lodge a complaint** with a supervisory authority if you believe that the processing that concerns you violates EU Regulation 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 the place where the alleged violation occurred (Article 77 of EU Regulation 2016/679).