# Web policy

Pursuant to current privacy legislation (European Regulation 2016/679 "GDPR" and Legislative Decree No. 196/03 and subsequent amendments and additions) the following policy is provided in relation to navigation on the website www.airportsforinnovation.com

This policy does not concern the use of cookies, for which please refer to the specific cookie policy.

### 1. DATA CONTROLLER

ADR S.p.A. (hereinafter also referred to as "ADR" or "the Controller") with registered office in Via Pier Paolo Racchetti 1 - 00054 Fiumicino (Rome).

### 2. DATA PROTECTION OFFICER

ADR has appointed a Data Protection Officer. Contact information for the Data Protection Officer can be found at https://www.adr.it/web/aeroporti-di-roma-en/

### 3. PURPOSE AND LEGAL BASIS FOR PROCESSING

This notice concerns the personal data processing activities carried out to enable the user to browse the website www.airportsforinnovation.com

In relation to the aforementioned services, ADR processes the data provided by the data subject for the pursuit of the aforementioned purpose in accordance with Article 6, letter b, GDPR, in order to ensure the performance of the service requested by the user.

## 4. TYPES OF DATA PROCESSED

The data processed by ADR include information which - although they do not allow ADR to trace it back to an identified and/or identifiable natural person - the IT systems and procedures used to operate this website acquire in the course of their normal operation. The transmission of such data is implicit in the use of Internet communication protocols.

IP addresses, addresses in URI/URL (Uniform Resource Identifier/Locator) notation of the requested resources, the time of the request, the method used in submitting 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 related to the user's operating system and IT environment may fall within this type of data.

# 5. PROCESSING METHODS

Data are processed in compliance with current regulations by means of IT and telematic tools, with logic strictly related to the stated purpose, so as to ensure the security and confidentiality of the data.

In order to protect the website and to make it easier for the user to fill in certain online fields, ADR uses Google's reCAPTCHA functionality to verify that the user is a natural person

and not a robot or spam. For more information, please consult the policies of the provider of the functionality.

### 6. DATA RETENTION PERIODS

Information is retained by the systems for as long as necessary for the purposes for which it is collected in accordance with the principle of minimization pursuant to article 5.1, letter c), GDPR.

ADR's website receives visitors' IPs, which are stored as browsing data for 3 months and stored for IT security logic for a period of 6 months.

### 7. DATA RECIPIENTS

Within ADR, only those individuals entrusted with the processing by the Controller and authorized to carry out processing operations on the aforementioned activities may become aware of the personal data provided. In addition, the data may be processed only by third party companies to which ADR may entrust specific activities and services related to the management of the website.

In particular, the data may be processed by the individuals that the Controller uses to maintain and manage the systems used as the External Processor and the Sub-Processors it uses.

In addition, ADR S.p.A. uses cloud services in order to optimize the performance of the <a href="https://www.adr.it/web/aeroporti-di-roma-en/">https://www.adr.it/web/aeroporti-di-roma-en/</a> website. ADR has signed a special Enterprise Agreement with Amazon Web Service EMEA SARL (https://aws.amazon.com/), selecting sites available within the European Economic Area for the storage of its content. In any case, the provider in question does not access the personal data of users acquired on the <a href="https://www.airportsforinnovation.com">www.airportsforinnovation.com</a> website, , limiting itself to using the essential information to deliver and and keep active cloud services.

Data may be disclosed to the relevant Public Authorities in fulfillment of legal obligations.

In any case, personal data will not be disseminated.

### 8. DATA TRANSFER OUTSIDE THE EU

Personal data are not subject to dissemination and/or communication to third parties located outside the European Economic Area.

### 9. RIGHTS OF THE DATA SUBJECTS

Finally, we would like to inform you that Articles 15-22 GDPR give data subjects the possibility to exercise specific rights when certain conditions are met; the data subject can obtain from the Data Controller: access, rectification, erasure, restriction of processing, as well as portability of the data concerning them.

The data subject also has the right to object to the processing. In the event that the right to object is exercised, the Data Controller reserves the right not to comply with the request, and thus to continue processing, if there are compelling legitimate grounds for processing that override the interests, rights and freedoms of the data subject.

The above rights may be exercised with a request addressed without formalities to the Data Protection Officer (DPO) at dpo@adr.it.

This is without prejudice to the data subject's right to to file a complaint with the Italian Data Protection Authority pursuant to Article 77, GDPR.

The Data Controller reserves the right to update this policy.

Last update, June 2024