# PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

**(pursuant to Article 13 of Regulation EU 2016/679)**

The data protection legislation currently in force, framed in accordance with the provisions of Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation, hereinafter the "EU Privacy Regulation"), contains provisions designed to ensure that personal data are processed in a manner that respects the fundamental rights and freedoms of natural persons, with particular regard to the right to the protection of personal data.

## 1. Purposes of Processing and Retention of Personal Data

Personal data are processed in the course of the Company's ordinary business and for the purpose of handling requests submitted by the data subject through the contact form.

Personal data will be retained for 1 (one) year.

## 2. Types of Personal Data Processed

Within the limits of the purposes set out above, the Controller will process the following ordinary personal data: the data subject's first name, surname and email address.

## 3. Data Processing

For the sake of transparency and in compliance with the principles set out in Article 12 of the GDPR, please note that "processing of personal data" means any operation or set of operations, whether or not carried out by automated means, performed on personal data or sets of personal data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. Personal data may be processed with or without the aid of electronic or otherwise automated means, and processing will also include, within the limits and subject to the conditions laid down by the GDPR, communication to the persons referred to in point 6 below.

## 4. Processing Methods

The personal data processed are:

a. processed lawfully and fairly by authorised persons duly assigned to those tasks, who are consistently identified, appropriately instructed and made aware of the obligations imposed by the GDPR;

b. collected and recorded for specified, explicit and legitimate purposes, and used in other processing operations in a manner compatible with those purposes;

c. accurate and, where necessary, kept up to date;

d. relevant, complete and not excessive in relation to the purposes for which they were collected or subsequently processed;

e. kept in a form which permits identification of the data subject for no longer than is necessary for the purposes for which they were collected or subsequently processed;

f. processed by paper-based, IT or telematic means, applying security measures designed to guarantee the confidentiality of the data subject to whom the data relate and to prevent undue access by third parties or unauthorised staff.

5. **Nature of the Provision of Data**

The provision of certain personal data is necessary. If the personal data requested are not provided, or if the data subject objects to the processing of the data provided, it will not be possible to handle the request.

6. **Communication of Data and Transfer of Data Abroad**

The personal data collected are processed by authorised staff who need access to them in order to handle requests.

The Controller reserves the right to transfer personal data to a third country on the basis of European Commission adequacy decisions or on the basis of appropriate safeguards provided for by applicable law. The data will not be disseminated.

7. **Use and Application of Tracking Pixels**

a. **What tracking pixels are and how they work**
Email communications sent by Trenord (hereinafter, the "Controller") may contain technical markers known as "*tracking pixels*", regardless of how the service is accessed (webmail, email client, mobile app, etc.) and of the device used. These are small pieces of code or electronic images embedded in the email message: when the recipient opens the

message (and the email client downloads the images from a remote server), the tool records the opening event and interacts with the user's device.

b. **Types of data collected:** Depending on the nature of the communication and the choices made by the Data Subject, activation of the *tracking pixel* may result in individual measurement and analysis of the open rate and click rate of the links contained in the emails sent.

c. **Purposes of processing and legal bases (Art. 122 of the Privacy Code and Art. 6 GDPR)**
Processing by means of *tracking pixels* is carried out in strict compliance with Article 122 of Legislative Decree No. 196/2003 (Privacy Code) and with Measure No. 284 of the Italian Data Protection Authority (Garante per la protezione dei dati personali) of 17 April 2026; it is considered that the use of such tracking pixels may fall within the statutory exemption, as it serves to provide you, as the recipient of communications sent by Trenord, with a more effective and efficient service, for your benefit, and to ensure the correct delivery of communications due under existing contractual relationships and/or by law.

d. **Commercial and promotional communications, newsletters and satisfaction surveys (processing based on consent pursuant to Art. 122(1) of the Privacy Code and Art. 6(1)(a) of the GDPR):**
In communications for marketing purposes, including newsletters, commercial offers, automated promotional communications or commercial *surveys*, the use of *tracking pixels* is intended for individual measurement and for analysing the open rate and click rate of the links contained in the emails sent, so as to optimise mailings and adapt their content and frequency, also on the basis of the interests and preferences attributable to the email recipient.

e. **Nature of the provision of consent and granular withdrawal of consent (Art. 7(3) GDPR)**
Consent to the receipt of *tracking pixels* in promotional communications may be given, at the time of registration or when updating preferences, together with the general consent to receive promotional communications (by means of a single, informed expression of will). Giving consent is optional: failure to give it, or its subsequent withdrawal, will not limit in any way the availability of the contractual services requested.
A Data Subject who has given consent has the right to **withdraw it at any time and as easily as it was given, including on a granular (partial) basis**, by choosing between two options:

- **Partial withdrawal (only *tracking pixels*):** deactivating only the individual tracking of email opens, **while continuing to receive promotional communications and newsletters as normal** without personalised *tracking pixels*;
- **Total withdrawal:** withdrawing consent to promotional communications in full, thereby stopping any future sending of marketing messages.

f. **Categories of recipients and retention periods**

Data collected through *tracking pixels* are processed by personnel authorised by the Controller and by third-party technology service providers (such as the Microsoft Dynamics 365 CRM), specifically appointed as Processors pursuant to Article 28 of the GDPR.

Data relating to the individual tracking of email opens for promotional purposes are retained for no longer than 24 (twenty-four) months from the date they are recorded, or until the Data Subject withdraws consent, after which they are deleted or irreversibly anonymised. Logs evidencing the consent given and any changes or withdrawals of preferences are retained for as long as necessary to demonstrate the compliance of the processing pursuant to Article 7(1) of the GDPR and to protect the Controller's rights in administrative or judicial proceedings.

8. **Rights of the Data Subject**

Pursuant to Articles 15 to 20 of the GDPR, you may exercise specific rights, including the right to obtain access to your personal data in an intelligible form and to obtain their rectification, updating or erasure. You also have the right to obtain from the Company restriction of processing, and you may object, on legitimate grounds, to the processing of your data. If you consider that the processing concerning you infringes the GDPR, you have the right to lodge a complaint with the Italian Data Protection Authority (Autorità Garante per la Protezione dei Dati Personali) pursuant to Article 77 of the GDPR.

9. **Controller and Data Protection Officer (DPO)**

The Controller of the processing, pursuant to Article 4.1.7 of the GDPR, is Trenord S.r.l., with registered office at Piazzale Cadorna 14, 20123 Milan. The Data Protection Officer (also "DPO") is Avv. Yari Mori. To exercise the rights under the GDPR referred to in point 6 of this notice, you may contact the DPO, to whom any request for information concerning the identity of the Processors acting on behalf of the Controller must also be addressed. The DPO may be contacted by post at the

Controller's registered office indicated above or by email at the following address: privacy@trenord.it.

The complete list of Processors and the categories of persons authorised to process data is available on request.