

## **PRIVACY POLICY ON FINDING LOST ITEMS AND TAGLESS LUGGAGE**

In compliance with current privacy regulations (Articles 13 and 14 of European Regulation 2016/679 "GDPR", Legislative Decree no. 196/03 and subsequent modifications and additions), the following policy is provided with regard to the data processed in relation to the service for the management of requests and the return of lost items and tagless luggage (hereinafter also referred to as the "Service").

### **1. DATA CONTROLLER**

Aeroporti di Roma S.p.A. ("ADR") with registered office in via Pier Paolo Racchetti, 1 - 00054 Fiumicino.

### **2. DATA PROTECTION OFFICER**

ADR has appointed a Data Protection Officer. The contact details of the Data Protection Officer can be found at [www.adr.it](http://www.adr.it).

### **3. TYPES OF DATA PROCESSED**

The data processed by ADR for the management of the Service consists of personal Data<sup>1</sup> such as personal details (e.g. first name, surname, nationality), details of identity documents, contact details (telephone number, e-mail address) and any other data necessary to follow up the report / request for search of lost property/tagless luggage and possible collection by the user.

ADR also reserves the right to obtain any other reasonable information to prove / confirm that the requesting user is the actual owner of the lost item / tagless luggage.

### **4. PURPOSE AND LEGAL BASIS OF PROCESSING**

Data will be processed for the management of the Service and for the performance of activities strictly related and instrumental in the management of the same. ADR will process the data in order to comply with the applicable airport security regulations; therefore, the legal basis for the processing for the aforementioned purpose is the legal obligation to which the Data Controller is subject pursuant to Article 6 (1) (c) of the GDPR.

For items lost in the landside area and at the security checkpoint, it is also possible to report the loss via the Lost&Found management service, powered by Thanks Boomerang Inc. When using this service, the user enters their request on the website managed by Thanks Boomerang Inc. as autonomous data controller.

The data is processed by Thanks Boomerang Inc. (please refer to the policies of the manager of that platform).

In any case, it is always possible to report lost items via ordinary telephone and e-mail channels.

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<sup>1</sup> Personal data are understood under the GDPR as: "any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person" (the "Data").

## **5. PROCESSING METHODS**

Data are processed in compliance with the regulations in force by means of IT, telematic and manual tools, with logic strictly related to the purposes indicated, so as to guarantee the quality, security and confidentiality of the data.

## **6. DATA RECIPIENTS**

The only persons who may have access to the data are those entrusted by the Data Controller with the processing and who are authorised to carry out processing operations relating to the activities described above. Furthermore, your data may be processed by:

- the authorised appointees of the companies ADR uses in the field of security, including ADR Security, which is specifically appointed as a data processor pursuant to Article 28 GDPR, and any external companies ADR uses that act as sub-processors pursuant to Article 28 GDPR;
- by IT service providers acting as data processors within the meaning of Article 28 GDPR.

The data will also be processed by Thanks Boomerang Inc. as:

- Autonomous data controller for all processes autonomously managed by Thanks Boomerang Inc. through its platform (please refer to the T&C and Privacy Policy defined by Thanks Boomerang Inc.);
- Data processor on behalf of ADR to enable ADR itself to search for information and images of lost items on the Boomerang platform and to receive all notifications of items that have been traced back to the owner in order to proceed with the return process.

Data may be disclosed to the competent Public Authorities such as ENAC, Polaria, in fulfilment of legal obligations. In any event, personal data shall not be communicated or disseminated.

## **7. DATA RETENTION PERIODS**

Data are only stored for as long as necessary for the purposes for which they are collected in compliance with the principle of minimisation pursuant to Art. 5 (1) (c) of the GDPR. In particular, Data collected will be kept for the time necessary for the management of the procedure and for the subsequent statutory period.

## **8. TRANSFER OF DATA OUTSIDE THE EU**

Data shall not be disseminated and/or disclosed by ADR to third parties located outside the European Economic Area. The use of the Thanks Boomerang Inc. platform involves the processing of personal data in the United States of America.

Any communications and interactions between Thanks Boomerang Inc. and ADR are conducted in compliance with Chapter V of the GDPR.

## **9. RIGHTS OF THE DATA SUBJECT**

Finally, we hereby inform that Articles 15-22 GDPR grant data subjects specific rights that can be exercised under certain conditions; data subjects may obtain from the Data Controller: access to their personal data and the rectification, erasure, restriction of processing and portability of data concerning them.

Data subjects also have 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 by making an informal request to the company's Data Protection Officer (DPO) at the following address: [dpo@adr.it](mailto:dpo@adr.it). This is without prejudice to the data subject's right to lodge a complaint with the Italian Data Protection Authority pursuant to Article 77, GDPR.

Regarding the possible use of the Thanks Boomerang Inc. platform, please refer to the privacy policy issued autonomously by Thanks Boomerang Inc.

## **10. UPDATES AND AMENDMENTS**

The Data Controller reserves the right to change and update this privacy policy over time.

Date of last update: November 2024