



Privacy and Cookies Policy and Data Processing Information

Revision: October 15, 2024

1. WHO WE ARE

ARE – AIRLINES REPRESENTATIVE EUROPE S.R.L (hereafter referred to as "ARE S.R.L.") with its legal office at Via Napoli 15/19 Ciampino (RM) - ZIP Code 00043, C.F. / VAT IT04105181004, is an airport services and passenger ground assistance provider. This policy is intended to inform all individuals about how their data is processed in compliance with the GDPR and other privacy regulations, for the purposes indicated below.

By "personal data processing," we refer to any operation or set of operations carried out with or without automated processes applied to personal data, such as collection, recording, organization, structuring, storage, adaptation or alteration, extraction, consultation, use, transmission, dissemination, or making available in any other way, comparison or interconnection, restriction, erasure, or destruction.

2. ROLE IN DATA PROCESSING

ARE S.R.L. acts as the Data Controller for the data of employees and for data collected through this website or other direct contact channels. It acts as the Data Processor for personal data of passengers received from its clients (airlines to whom it provides ground handling services).

The contact details of the Data Controller are privacy@aregroup.com.

According to Articles 37 and following of the EU Regulation 2016/679, the company has appointed a Data Protection Officer (DPO): Attorney Adriana De Luca Bitonti, gdpr@aregroup.com.

3. WHAT THIS POLICY IS ABOUT

With this policy, we aim to inform you about why and how we process personal data in our business activities, either directly or on behalf of our clients, or when you use our websites and the services offered through them ("Services"), to whom this data is communicated, what your rights are, and who you can contact for further information or questions.

We are committed to protecting your privacy and handling your personal data openly and transparently, in particular in compliance with the General Data Protection Regulation 2016/679 ("GDPR").

Our website pages may contain links to third-party sites, including those of clients or suppliers, public and private entities. Although we strive to link only to sites that share our high security and privacy standards, we are not responsible for the content or privacy practices of other sites. We strongly recommend that you review the privacy and cookie policies of these sites before providing any personal information.

4. HOW WE ACQUIRE YOUR DATA

We may obtain your personal data as part of our business activities during the purchase of airport services, in the process of candidate selection, or when you use our website, including by filling out the service request forms on dedicated links. We may acquire such personal data because you provide it with your consent (e.g., by contacting us or using our airport assistance services), or because third parties provide it to us (e.g., your employer or third-party service providers we use, or airlines—clients that use our ground handling services), or because the data is publicly available.



5. DATA WE COLLECT

The personal data we collect or obtain may include, among others:

- Standard identification data (e.g., name, address, phone number, email, country of residence).
- Electronic identification data (e.g., IP addresses, browser type, cookie identifiers).
- Personal characteristics (e.g., age, gender, date of birth, place of birth, nationality, family composition).
- Financial data (e.g., bank account number, credit card details).
- Employment and education data (e.g., organization you work for, education or job title, qualifications).
- Data about how you interact with us (e.g., when you contact us using details from our website or by filling out relevant forms), and other similar information.

We will not process sensitive data (such as racial or ethnic origin, political opinions, religious or philosophical beliefs, union membership, genetic data, biometric data, health data, or data about sexual orientation) unless it is strictly necessary for the services we provide on behalf of the client (e.g., communicating any food intolerances to the airline or handling assistance services for individuals with disabilities).

Please note that this data will be processed manually and/or with the support of digital or electronic means for the following purposes.

6. PRIMARY PURPOSES OF PROCESSING

We process your personal data for legitimate business reasons. These purposes include, but are not limited to:

- Providing ground assistance services to passengers.
- Managing and transporting luggage, including lost & found services.
- Ticketing services and check-in assistance.
- Managing customers, orders and supplies.
- Invoicing and accounting.
- Providing information about our services and activities and public relations.
- Efficient organization of our services.
- Marketing, commercial communications and sales.
- Handling customer/ supplier requests and complaints.
- Managing disputes.
- Conducting statistical and market research.
- Controlling access.
- Security

The data processed, which may include the geographic location of individuals or objects through an electronic communication network, is used for purposes related to ticketing services, fulfilling any other legal obligations related to airport services, and managing potential disputes between parties (e.g., complaints, contractual non-compliance).

The data is provided by the client to our company to perform the delegated operations or by the customer directly at ticketing counters. In compliance with the "necessity" principle (i.e., only requesting strictly necessary data), we inform the individual that refusal to provide such data will make it impossible to carry out the intended services, thereby rendering the relationship between the parties unworkable or failing to meet specific legal obligations.



7. LEGAL BASES FOR PROCESSING

We process your personal data for the reasons mentioned above:

- When necessary for the performance of contracts to which you are a party, or to respond to your requests and fulfill pre-contractual formalities.
- When necessary to comply with legal obligations.
- To pursue the legitimate interests of our company and/or third parties, including (but not limited to) our business activities, client and supplier management.
- Based on your informed consent.

In the latter cases, where we are legally obligated to obtain your free, informed, specific, and unequivocal consent to process your personal data for specific purposes, we will process your data only for those purposes and to the extent we have obtained your consent. The data collected may be communicated, as necessary for executing the mandate, to internal staff for processing operations or to external collaborators specifically appointed by ARE S.R.L. or the Client (as the Data Controller).

As Data Controllers, we will not transfer your data to third countries outside the European Union. In general, we will take all reasonable measures to ensure that your data is processed securely and in compliance with this Privacy and Cookies Policy.

8. COOKIES

Cookies are small text files stored by your browser on your computer or mobile device when you visit this website. They are used to provide you with a good browsing experience and to help us improve the website. You can enable, disable, and/or delete cookies as you wish. You can delete all cookies that are already on your device and you can set most browsers (Chrome, Safari, Firefox, Internet Explorer) to prevent them from being placed. The settings to enable, disable, and/or delete cookies are usually found in the "options" or "preferences" menu of your internet browser. To know our Cookies Policy please see it at: <https://www.aregroup.com/it/cookie-policy/>

9. SECURITY OF YOUR DATA

We implement strict technical and organizational measures to protect your information from unauthorized access, unlawful processing, accidental loss, destruction, and damage, both online and offline.

These measures include:

- Staff training and awareness to ensure knowledge of privacy obligations when handling personal data.
- Adoption of specific binding procedures for staff and collaborators to ensure data protection and correct data storage, including the adoption of a company IT regulation, operational procedures for data storage and transmission via digital and electronic means, privacy notice for employee informed consent, the obligation of confidentiality, and a reinforced contractual confidentiality agreement, and procedures for restoring security in case of a Data Breach.
- Administrative and technical controls to limit access to personal data based on necessity and minimization criteria.
- Technological security measures, including continuously updated software protection, such as firewalls, encryption, and restricted access.
- Physical security measures, such as employee access badges and restricted access storage.



It is important to remember that while our security measures are appropriate, they may not always be sufficient to ensure absolute protection, especially when transmitting data over the Internet (including via email). We are constantly working to protect your personal data through ongoing technological updates, though it is impossible to guarantee absolute data security during transmission to or from us.

10. DATA RETENTION AND OTHER INFORMATION

Pursuant to Article 13, paragraph 1, letter (f) of the EU Regulation, your data will be retained for the time necessary to carry out the activities mandated, in compliance with the data and document retention times required by law. The five-year or ten-year retention periods for civil, accounting, and fiscal documents, as prescribed by current laws, remain unaffected. Your personal data will not be retained for longer than necessary for the purposes described above and in accordance with our internal retention policy and legal compliance. In principle, your personal data will NOT be used for automated decision-making. We do not base any decisions regarding you solely on the automated processing of your personal data.

11. EXERCISING YOUR RIGHTS

Under Article 7 of the Privacy Code and Articles 13, paragraph 2, letters (b) and (d), 15, 18, 19, and 21 of the EU Regulation, we inform you that you have the right to:

- Obtain confirmation that we are processing your personal data and request a copy of the personal data we hold about you.
- Request access to your personal data, its rectification or erasure, or restriction of processing, or object to its processing, as well as the right to data portability.
- Lodge a complaint with the Data Protection Authority following the procedures and instructions published on the official website of the Authority at www.garanteprivacy.it.

The exercise of these rights is not subject to any formal constraints and is free of charge. You may revoke your consent to the processing of your personal data to the extent that such processing is based on consent, without causing any harm to you, except in cases where such revocation would lead to the termination of an existing contract or legal relationship. For convenience, here is a link to Articles 15 to 23 of the EU Regulation, which can be consulted at this link: <https://eur-lex.europa.eu/legal-content/IT/TXT/?uri=celex%3A32016R0679>.

12. CHANGES TO THIS PRIVACY AND COOKIES POLICY

We may modify or amend this Privacy and Cookies Policy from time to time. Any changes will be posted on this page, including the date of the update. The new, modified, or amended Policy will apply from that revision date. Please check this page periodically to see if any changes have been made