

Privacy Policy

pursuant to the Art. 13 and 14 of Regulation (EU) 679/2016 (“GDPR”)

WHO WE ARE

The Company Airport Handling S.p.A, with registered office at Aeroporto Milano Malpensa, Terminal 2, 21019 Somma Lombardo – Varese (VA) (hereinafter the “**Company**”) pays the utmost attention to the security and confidentiality of personal data while performing its activities.

The Company acts in its capacity as data controller with regards to personal data collected through this website (hereinafter the “**Website**”).

As the Company reserves the right to add or remove functionalities from the Website and/or to modify its services at any time, this Privacy Policy may be updated from time to time by the Company.

Before using the Website, please read this Privacy Policy carefully, in order to check for any updates.

WHICH PERSONAL DATA MAY BE COLLECTED

The following categories of personal data relating to you, which you voluntarily provide, may be collected by the Company in the performance of its activities (the term “**Data**” shall mean all the categories listed below, jointly considered):

- **Identification and contact details** – information about your name, surname, date of birth, telephone number, email address, city of residence/domicile;
- **Other personal data** – information about the company you work for, as well as other data you may provide spontaneously while browsing the Website;
- **Use of the website** – information on how you use the Website, how you open or forward the advertisements, including information acquired via cookies (see our Cookie Policy [here](#) or at <http://www.airporthandling.eu/en/cookies.asp> for any detail).

HOW WE COLLECT YOUR PERSONAL DATA

The Company collects and processes your Data in the following circumstances, better described in the paragraph relating to the following paragraph:

- If you access to the Website in order to use its functions;
- If you wish to get in touch with the company by using the related areas on the Website;
- If other companies of the Group or business partners lawfully share your Data to us.

If you provide Data on behalf of someone else, you must first ensure they have read this Privacy Policy.

We kindly ask you to help us keep your Data up to date. If there are any changes, please inform us.

WHAT PURPOSES CAN YOUR PERSONAL DATA BE USED FOR

The Company may process your Data for one or more of the following purposes, in accordance with the legal basis indicated from time to time.

a) Management and answer to your questions and information requests.

The Company may process your Identification and contact details and Other personal data in order to answer to your questions and request information made by you by using the forms on the Website.

Legal basis for processing: processing is necessary for the performance of a contract and/or in order to take steps at the request of the data subject prior to entering into a contract.

Providing your Data marked with asterisk (*) is mandatory in order to answer to your questions; failure thereof would prevent us from doing so.

Providing your Data which are not marked with an asterisk (*) is not mandatory; failure thereof shall have no consequences on the contract relationship.

b) Defend a right in the course of judicial, administrative or extra-judicial proceedings and in the context of disputes arising in connection with the services offered.

The Company may process your Data to defend its rights or act or even bring claims against you or any third party.

Legal basis for processing: legitimate interest of the Company to defend its rights in court.

Providing your Data for such purpose is mandatory; failure thereof would prevent the Company from defending its rights.

c) Purposes relating to obligations provided for by laws, regulations and European legislation, by provisions / requests for authorities entitled to do so by law and/or by supervisory and control bodies.

The Company may process your Data in order to fulfil the obligations to which it is subject.

Legal basis for processing: legal obligation.

Providing your Data for such purpose is mandatory; failure thereof would prevent the Company from complying with specific legal obligations.

HOW WE KEEP YOUR PERSONAL DATA SAFE

The Company uses a wide range of security measures to improve protection and maintain the security, integrity and accessibility of your Data.

All your Data are stored on our secure servers (or on secure paper copies which are duly archived) or on those of our suppliers or business partners, and may be accessed and used based on our standards and our security policies (or equivalent standards for our suppliers).

HOW LONG DO WE STORE YOUR INFORMATION FOR

The Company will keep your Data only for the time necessary to achieve the purposes for which they were collected or for any other related and lawful purpose. Therefore, if Data is processed for two different purposes, we will store such Data until the processing purpose with the longest term ends; however, we will no longer process Personal Data for the purpose for which the retention period has expired.

We limit access to your Data only to those who need to use them for relevant purposes.

When your Data are no longer required, or when there is no longer any legal basis for storing them, they will be irreversibly anonymized or securely destroyed.

The retention periods relating to the different Data processed are indicated as follows:

- **Identification and contact details** – such data will be stored for all the duration of the contractual relationship and however no longer than the following 10 years.
- **Other personal data** – such data will be stored for all the duration of the contractual relationship and however no longer than the following 10 years.

With particular reference to the purposes related to defend a right in court or comply with requests made by authorities, as described under letters b) and c) above, Data will be stored for the time strictly necessary to comply with the request or defend our right.

WHO WE CAN SHARE YOUR PERSONAL DATA WITH

Your Data may be accessed by Company's duly-authorized employees, of companies of the Group for internal administration purposes and by external suppliers, appointed, where necessary, as data processors, which support us in providing services.

Please contact us at the addresses indicated below if you wish to see the list of data processor and other entities we share your Data with.

INTERNATIONAL TRANSFERS

The Company may have to transfer your Data to third countries which are not part of the European Union (EU) or the European Economic Area (EEA), which data protection laws may have lower standards of those provided for in the EEA. In this case, the Company will make it sure that all your Data which can be accessed outside the EEA are processed with appropriate safeguards.

The Company will provide for adequate measures for such international transfers, in compliance with the data protection law; such measures include the Standard Contractual Clauses approved by the European Commission, Codes of conduct and/or Binding Corporate Rules. Such measures require similar data protection obligations directly on the recipient, unless we are allowed by the applicable data protection law to transfer Data without such formalities.

You can ask a copy of such documentation by contacting us at the address indicated in paragraph "Contacts".

CONTACTS

The contact details for the Company, are the following:

Airport Handling S.p.A.

Aeroporto Milano Malpensa, Terminal 2 – 21019 Somma Lombardo, Varese (VA)

Email: privacy@airporthandling.eu

The Company has also appointed, pursuant to article 37-39 of the GDPR, a Data Protection Officer, which you can reach at the following email address: dpo@airporthandling.eu.

YOUR PERSONAL DATA PROTECTION RIGHTS AND YOUR RIGHT TO LODGE A COMPLAINT BEFORE THE SUPERVISORY AUTHORITIES

With request made without any formality to the Company, you have the right to request it, in any moment, provided that the legal basis for your request is met:

- access to your Data;
- a copy of the Data you have provided to us (so-called data portability);
- rectification of Data in our possession;
- erasure of any Data for which the Company no longer has a legal ground for processing;
- withdrawal of consent, in cases where the processing is based on consent,
- restriction of the way in which the Company processes your Data, to the extent permitted by current legislation.

Right to object: In addition to the above rights, you have the right to object at any time, for reasons related to your particular situation, to the processing of Data concerning you carried out by the Company for the pursuit of its legitimate interest.

The request for objection should be addressed to the following address: : privacy@airporthandling.eu

The exercising of the above rights is free and is not subject to formal constraints, but it is subject to certain exceptions that are intended to safeguard the public interest (e.g. the prevention or identification of crimes) and the Company's interests (e.g. keeping professional secrecy). Should you wish to exercise any of the above rights, we will check that you are entitled to do so and will usually respond within one month.

If in your opinion our processing of Data is not compliant with the GDPR, you have the right to lodge a complaint with the Italian Supervisory Authority – the *Garante per la protezione dei dati personali* by using the contact details available on the website www.garanteprivacy.it, or refer the matter to the appropriate courts.