

PRIVACY NOTICE

Pursuant to articles 13 and 14 of EU Regulation 2016/679 (“GDPR”)

With this Privacy Notice (“*Informativa*”) we want to inform you about the potential collection and processing of your personal data as well as about the rights you are entitled to in your quality of Data Subject (“*Interessato*”).

We seriously take care of your privacy and we assure our best commitment in the protection of the personal data you may share with us. We will be clear and transparent about the information we are collecting and what we will do with that information. Your personal data will be processed lawfully, fairly and limited to what is strictly necessary, in a manner that ensures appropriate security to that data.

1. Who is the Data Controller

The Data Controller (“ *Titolare del Trattamento*”) who determines the purposes and means of the processing of your personal data is Lufthansa Technik Milan S.r.l. represented by its *pro tempore* legal representative. Contact details:

- Registered office: 21019 – Somma Lombardo (VA), Terminal 1, Fabbricato 181, Italy
- Email: eu-gdpr@lht-milan.com

2. What data are being collected

We may collect only basic information about you and your company limited to the following categories:

- Information about you (e.g. name, tax code, date of birth, ID document, address, title/office, email, telephone and fax number) and your company (e.g. name, address, VAT and tax code, email, telephone and fax number)
- Information about your use of our website
- Information about the communications you exchange with us via letters, emails, calls and social media

3. What do we use your personal data for, why and how

We may collect your personal data directly from you (e.g. when you enter into an agreement with us or when you visit our website) as well as from third parties and/or other sources (e.g. internet).

When collected, your personal data may be used for the following purposes:

- a. To comply with duties and obligations imposed by the law as well as by agreements
- b. To perform the preliminary activities aimed at entering into a contract with you
- c. To enter into an agreement with you and to fulfil the obligations set out therein and connected therewith, in particular those imposed by public or private entities
- d. To perform the services from time to time requested by you
- e. To manage the tax and administrative obligations connected with agreements
- f. To grant you the technical support or to exchange with you technical information about goods and/or services requested/purchased;
- g. To share with you marketing information that we think you could be interested in via e-communications. You will have the **choice to opt-in or opt-out** of receiving such communications by granting your express consent at the beginning as well as you will be given the opportunity to indicate that you no longer wish to receive our direct marketing material on every e-communication that we send you;

Your personal data will be collected and processed by means of paper documents and/or telematic and electronic devices. We follow strict security procedures in the storage and disclosure of your personal data also to protect it against accidental loss, destruction or damage. Processing of your personal data is conducted through data management techniques that ensure the confidentiality and security of the information in compliance with article 32 of GDPR and that are consistent with our disclosed purposes in such processing.

4. What legal ground for processing do we have

We will only process your personal data where we have a legal ground to do so. The legal ground will depend on the reasons we have collected and need to use your personal data for. Sometimes your prior consent will not be necessary because other legal grounds set forth in article 6 of GDPR justify the processing of your personal data.

We may collect and process your personal data if:

- You have given your consent to us to the processing of your personal data for one or more specific purposes (e.g. for marketing purposes)
- Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract
- Processing is necessary for compliance with legal obligation to which we are subject according to Italian, German and/or EU law (e.g. contract obligation)
- Processing is necessary for the performance of a task carried out in the public interest according to Italian, German and/or EU law

5. Mandatory or discretionary disclosure of your personal data and consequences of refusal

You are free to disclose or not to disclose your personal data with us. However, the process of your personal data may be necessary for one or more specific purposes:

- For the purposes listed at point 3, letters [a,b,c,d,e,f], your consent is mandatory. Your refusal to grant the consent will prevent us from entering into and performing any contract with you as well as any related activity
- For the purposes listed at point 3, letter [g], your consent is discretionary. However your refusal to grant the consent will prevent us from sharing marketing information with you

In the event the process of your personal data is subject to your prior consent you will have the right to later withdraw the consent at any time. Please note that this will not affect the lawfulness of the processing made before your withdrawal.

6. How long do we retain your personal data

We will not retain your personal data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the nature of the personal data, the purposes for which we process it and whether we can achieve these purposes through other means. We must also consider periods for which we might need to retain personal data in order to meet our legal obligations or to protect our legal rights in the event of a claim in compliance with the statute of limitation set forth by the law. When we no longer need your personal data, we will promptly delete or destroy it.

In any case, your personal data will not be retained for a period longer than [2] years after the contract expiration

7. Who will your personal data been shared with

Your personal data will be processed by the Data Controller, its shareholders, directors and auditors as well as its employees duly appointed as Persons Authorized to the Processing (*"Incaricato del Trattamento"*) that will act under the authority of the Data Controller and in compliance with the instructions thereof.

Your personal data may be shared with other companies within the Lufthansa Group, in particular with companies that directly or indirectly control the Data Controller such as Lufthansa Technik AG and Deutsche Lufthansa AG.

We may also share your personal data with public or private subjects, natural or legal persons, used by the Data Controller to carry out activities which require the communication of the Data, for legal or contractual obligations. In this event, we require all third parties to have appropriate technical and operational security measures in place to protect your personal data consistent with Italian, German and EU law on data protection.

Sometimes we may need to have other parties carry out the processing of your personal data on our behalf. Said subjects will be appointed as Data Processors (*"Responsabile del Trattamento"*). We will use

only Data Processors who provide sufficient guarantees to implement appropriate technical and organisational measures in such a manner that processing will meet the requirements of GDPR and ensure the protection of your personal data. Processing by a Data Processor will be governed by a contract or another legal act under Italian, German or EU law that is binding on the Data Processor towards the Data Controller and that sets out the limits of the processing and the obligations upon the Data Processor. An updated list of the Data Processors appointed in compliance with article 28 GDPR can be requested to the Data Controller.

The Data Controller operates its business in multiple jurisdictions, some of which are not located in the European Economic Area (EEA), such as [e.g. Oman, Saudi Arabia, Africa]. While countries outside the EEA do not always have strong data protection laws, we require all services providers to process your information in a secure manner and in accordance with Italian, German and EU law on data protection. We utilise standard means under EU law to legitimise data transfers outside the EEA, such as:

- indicating the existence or absence of an adequacy decision by the EU Commission for the receiving third country (art. 45 GDPR) or
- reference to the suitable safeguards (art. 46, 47 GDPR) and the means to obtain a copy of them or where they have been made available or
- reference to the relevant exceptions that allow the international data transfer (art. 49 GDPR)

Your personal data will not be disseminated at any time.

8. Rights you are entitled to as Data Subject

With regard to the processing of personal data described in this Privacy Notice, in your quality of Data Subject you are entitled to exercise the rights set forth in articles from 15 to 22 of GDPR, under the terms and conditions set out therein, in particular:

- **Right of access.** You have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you are being processed and, where that is the case, access to personal data and the following information:
 - a) the purposes of the processing
 - b) the categories of personal data concerned
 - c) the recipients to whom the personal data have been or will be disclosed
 - d) the envisaged period for which the personal data will be stored or the criteria used to determine that period
 - e) your rights, e.g. to request from the Data Controller the rectification or erasure of personal data, the restriction of the processing or to object to such processing
 - f) the right to lodge a complaint with a supervisory authority
 - g) where the personal data are not collected from you, information as to their source
 - h) the existence of automated decision-making, including profiling
- **Right of rectification.** You have the right to obtain from the Data Controller the rectification of inaccurate personal data and/or the integration of incomplete personal data without undue delay.
- **Right to erasure.** You have the right to obtain from the Data Controller, and the Data Controller is obliged to, the erasure of your personal data without undue delay when:
 - a) your personal data are no longer necessary for the purposes for which they were collected or otherwise processed
 - b) you have withdrawn your consent on which the processing is based and there is no other legal ground to justify the processing
 - c) you have successfully objected to the processing
 - d) your personal data have been unlawfully processed
 - e) your personal data have to be erased for compliance with a legal obligation
 - f) your personal data have been collected in relation to an offer of the information society services referred to in article 8(1) of GDPR
- **Right to restriction of processing.** You have the right to obtain from the Data controller the restriction of the processing of your personal data when:
 - a) you have contested the accuracy of the personal data

- b) the processing is unlawful but you prefer to have the processing restricted instead of the personal data erased
- c) the Data Controller no longer needs your personal data but they are necessary for you for the exercise or the defence of legal claims
- **Right to data portability.** You have the right to receive the personal data you have provided to the Data Controller in a structured, commonly used and machine-readable format. You have also the right to transmit those data to another controller, without objections of the Data Controller, when the processing is based on consent or on a contract and the processing is carried out by automated means.
- **Right to object.** Where personal data are processed for direct marketing purposes you have the right to object at any time to the processing of your personal data for such marketing, which includes profiling, to the extent that it is related to such direct marketing. Upon your objection, your personal data will no longer be used for direct marketing purposes.
- **Right to file a complaint before the Data Protection Authority** (in Italy, Garante per la protezione dei dati personali headquartered in 00186 – Rome, Piazza di Montecitorio 121)

You can exercise the rights listed above by submitting a request with no formalities to the Data Controller at the contact details indicated at point 1 above.

Please be aware that this Privacy Notice may be updated from time to time. The Data Controller invites you to regularly check any update to this Privacy Notice available at: <https://www.lufthansa-technik.com/lufthansa-technik-milan>.

THE DATA CONTROLLER

Dirk Kowalzik
Lufthansa Technik Milan S.r.l.

Having read the Privacy Notice above, I hereby

- consent**
- do not consent**

to the processing of my personal data for the purposes listed in this Privacy Notice for which the consent represent the legal ground for the processing.

_____, _____
Place *Date*

THE DATA SUBJECT

Signature: _____
Name and Surname: _____