

**Information on the processing of personal data pursuant to articles 13-14 of the Regulation (EU) 2016/679  
To suppliers, consultants and collaborators**

**1. Data controller and contact details**

**So.G.Aer. SpA** (hereinafter referred to as So.G.Aer., or "Data Controller" or "Company"), with registered offices in Elmas, at "Mario Mameli" airport via dei Trasvolatori s.n., in its capacity as Data Controller, pursuant to articles 13 and 14 of EU Regulation 2016/679 (hereinafter also "GDPR") with reference to the processing of your personal data, informs you that the aforementioned legislation provides for the protection of data subjects with respect to the processing of personal data and that this treatment will be based on the principles of correctness, lawfulness, transparency and the protection of your privacy and rights.

Your personal data will be processed in accordance with the legislative provisions of the GDPR and the obligations therein.

The Data Controller's contact details are as follows:

So.G.Aer. SpA - Mario Mameli Airport Management Company

Address: via dei Trasvolatori, s.n., 09067 Elmas (CA)

E-mail address: [info@cagliariaairport.it](mailto:info@cagliariaairport.it) ;

Tel: +39 070 211211 - Fax: +39 070 241013

**2. The Data Protection Officer (DPO)**

So.G.Aer has appointed a person to be responsible for the protection of personal data, known as the data protection officer (DPO), who can be contacted at [dpo@sogaer.it](mailto:dpo@sogaer.it), or at the address via dei Transvolatori, s.n., 09067 Elmas (CA). The data protection officer has, among other things, the responsibility for checking compliance with rules and policies regarding the processing of personal data and can be contacted by you for all matters relating to the processing of your personal data and the exercising of your rights.

**3. Purpose of the processing**

Your personal data is processed in order to:

- manage and administer supplier and consultant contracts, (including the management of pre-contractual relationships and / or inclusion in the Company's supplier register);
- fulfill mandatory legal and tax compliance obligations;
- fulfill obligations under applicable laws, in particular those pursuant to Legislative Decree 50/2016 (Public Contracts Code), and the Anti-Corruption Law (Law 190/2012), and related legislation;
- manage obligations related to Legislative Decree 231/2001: - Administrative liability of corporate bodies arising from criminal activity - and the related organizational model which So.G.Aer. has;
- manage any litigation, execution of internal controls (safety, productivity, quality services, integrity and financial soundness), certification;
- assess the existence of ethical and legal requirements identified by the Company in the Code of Ethics and for the purpose of audits;
- send newsletters and information.

The internal policies of So.G.Aer. provide that such personal data - managed by Company employees - are collected in paper and computer archives and processed strictly in accordance with the stated purposes.

**4. Legal basis of the processing**

So.G.Aer. treats your personal data lawfully, i.e. where:

1. the processing is necessary for the execution of a contract of which you are part or the execution of pre-contractual measures taken upon request;
2. the processing is necessary to fulfill a legal obligation of So.G.Aer.;
3. the treatment is based on the legitimate interest of the Data Controller, for example to verify ethical requirements or financial soundness;
4. the processing is based on your express consent, for example the sending of newsletters.

## **5. Categories of personal data**

The personal data processed for the aforementioned purposes, and during the performance of the contractual relationship, are:

- name, address and other contact details (phone number, e-mail address and certified email address);
- date / place of birth, nationality, professional activity, identity document data, data of subscription, tax code, VAT number;
- bank and payment data, insurance data;
- data relating to training, work and professional experiences.

The Company may process personal data relating to criminal convictions and offenses exclusively in cases provided for by law or public authority (for example, for the verification of conditions impeding participation in tenders and tenders pursuant to the Contracts Code and for the verification of requirements of integrity).

## **6. Recipients or categories of recipients of personal data**

Your personal data may be communicated to:

1. professionals, external consultants and their representatives who provide functional services for the purposes indicated above;
2. service companies, companies and consultancy or data processing offices;
3. banking and insurance institutions that provide functional services for the purposes indicated above;
4. audit and accounting certification bodies;
5. group companies, subsidiaries, affiliates, parent companies, or companies connected to our group;
6. public offices and agencies;
7. judicial or administrative authorities for the fulfillment of legal obligations.
8. employees of So.G.Aer and staff controlled by So.G.Aer, expressly designated and authorized, to whom specific instructions have been provided. Authorized personnel have different levels of access depending on their specific roles.

Your data, solely as required by legal disclosure and transparency obligations, and in compliance with the principle of data minimization, may be subject to disclosure.

## **7. The source from which the personal data originate**

The personal data that the company processes is collected from the data subject, or can also be obtained through other channels including, for example:

- websites and social networks, in which case we invite you to consult the specific information published on the Company website, and on websites managed by third parties;
- public lists and sources accessible to the public (for example commercial and trade registers, bodies of press, media);
- other data controllers / joint data controllers, including companies within the Company group.

## **8. Transfer of data to a third country**

Your data will not be transferred outside the European Union.

## **9. Period of storage of personal data**

Your personal data, subject to processing for the purposes indicated above, will be kept for the duration of the contract and, subsequently, for the time in which the Company is subject to obligations of expected conservation, also for accounting and tax purposes (for example the obligation to keep invoices and documentation for 10 years), or for other purposes, by law or regulation.

## 10. Rights of the interested party

Your rights are listed below:

- you have the right to ask So.G.Aer. to **access your personal data** and the **information** relating to it, the **rectification** of inaccurate data or the **integration** of incomplete data, the **deletion** of personal data concerning you (where one of the conditions indicated in article 17, paragraph 1 of the GDPR is met and in compliance with the exceptions provided for in paragraph 3 of the same article, for example if your data is processed unlawfully), the **restriction** of the processing of your personal data (where one of the grounds indicated in art. 18, paragraph 1 of the GDPR, for example your data is treated illegally).
- you have the right, when the legal basis of the processing is contractual or based on consent, including automated processing, to the **portability of personal data**; upon request you may obtain your personal data from So.G.Aer. in a structured and machine-readable format such that you can provide the data to another data controller, including in an automated manner, where technically possible.
- you have the right to **object** at any time to processing of your personal data on grounds relating to particular situations that concern you.
- you have the right to **withdraw consent at any time** if the processing is based on your consent for one or more specific purposes and concerns common personal data (for example, date and place birth or place of residence), or special categories of data (for example, data revealing the your racial origin, political opinions, religious beliefs, health or your sex life). The processing carried out before the revocation remains lawful.
- you have the right to **lodge a complaint with a supervisory** authority (“Autorità Garante” for the protection of personal data - [www.garanteprivacy.it](http://www.garanteprivacy.it) ).

To exercise the aforementioned rights, or to request information or clarifications, you can contact the Data Controller or the Data Protection Officer, at the contacts listed above.

## 11. Consequences of failure to communicate personal data

With regard to the communication of personal data for a contractual obligation (for example the stipulation or execution of the contract) or legal (for example the obligations related to the keeping of accounting records and tax), the **lack of communication of personal data prevents the completion of the contractual relationship itself**.

## 12. Automated decision making, including profiling

Your personal data will not be subject to any automated decision-making processes, including profiling.