

# **Information on the processing of personal data pursuant to art. 13 of the Regulation (EU) 2016/679**

## **To employees**

Dear Sir / Madam

---

This document is to inform you that, by undertaking a contractual relationship of employment with you, our Company, in the performance of that contract, will find itself collecting personal data relating to you.

We hereby wish to inform you, among other things, of the purposes of processing your personal data and of your legal rights pertaining to it.

### **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 privacy 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 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:

- proceed to the recruitment phase, and to the subsequent holding and management of your position within the business as well as tax and insurance matters through the Company's IT system;
- proceed with the extraction of statistical information;
- send correspondence;
- ensuring the fulfillment of the obligations deriving from the employment contract (eg the remuneration and all obligations required by law in the field of taxation and accounting);

- ensure other rights deriving from the legislation on labor law (service allowance, sickness, holidays, leave, disciplinary proceedings, etc.) and related rights (eg Law n. 104/92);
- fulfill additional obligations provided by the laws in force (for example, when necessary, security clearance verification);
- manage the obligations connected with Legislative Decree 231/2001 and the related organizational model;
- manage the procedures related to the reporting of offenses (so-called "whistleblowing");
- defense in court and protection of rights.

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**

So.G.Aer. treats your personal data lawfully, that is where:

1. the processing is necessary for the execution of a contract of which you are part or the execution of pre-contractual measures adopted upon request (e.g.: remuneration purposes - pursuant to art. 6.1, lett. b) of the GDPR)
2. the processing is necessary for the fulfillment of obligations provided for by law (ex.: calculation of withholding tax - pursuant to art. 6.1, lett. c) of the GDPR)
3. the treatment is necessary to pursue the legitimate interest of the employer (e.g.: preventing loss of corporate materials and / or improving worker productivity - pursuant to art. 6.1, lett. f) of the GDPR)
4. processing is necessary to fulfill a legal obligation of So.G.Aer.;

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

Your personal data may be disclosed to:

1. business consultants and accountants, lawyers who provide functional services for the purposes indicated above;
2. banking and insurance institutions that provide functional services for the purposes indicated above;
3. associated companies or subsidiaries of our Company;
4. trade union organizations to which you are registered;
5. subjects that process data in compliance with specific legal obligations;
6. judicial or administrative authorities, for the fulfillment of legal obligations;
7. company doctor - appointed as Data Processor - in the context of health surveillance;
8. employees of So.G.Aer and staff controlled by So.G.Aer, specifically appointed and to whom specific instructions have been provided. Authorized personnel have different levels of access depending on their specific roles.

#### **6. 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 period you are employed and, subsequently, for the time in which the Company is subject to conservation obligations, for tax purposes or for other purposes, set forth by law or regulation.

## 7. Transfer of data to a third country

Your data will not be transferred outside the European Union, except for specific cases for which the Company will adopt adequate guarantees and will inform the persons concerned beforehand.

## 8. 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.
- you have the right to obtain from So.G.Aer the **rectification** of inaccurate data or the **integration** of incomplete data.
- you have the right to obtain from So.G.Aer 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),
- you have the right to obtain from So.G.Aer the **restriction** of 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 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 (e.g. another employer), without any impediment on the part of So.G.Aer.
- you have the right to **object** at any time to processing of your personal data on grounds relating to particular situations that concerns you.
- 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) ).
- 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 your racial origin, political opinions, religious beliefs, health or your sex life), you have the right to **withdraw consent at any time** by the same procedure with which you gave it. The processing carried out before the revocation remains lawful.

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.

## 9. Consequences of failure to communicate personal data

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

## 10. Automated decision making, including profiling

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