



Privacy policy on the processing of personal data pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC [General Data Protection Regulation]

Società per Azioni Esercizi Aeroportuali S.E.A., a joint-stock company with registered office at Milan Linate Airport, Segrate (Milan), VAT No./Tax Code 00826040156, registered with the Companies Register of the Milan Monza Brianza Lodi Chamber of Commerce under no. 00826040156, with fully paid-up share capital of EUR 27,500,000.00 ("**SEA**" or the "**Company**"), processes the personal data provided for access to and use of the Malpensa Cargo Ecosystem, which consists of a platform for consulting and exchanging data and information relating to goods arriving at and departing from Milan Malpensa ("**Platform**") ("**Personal Data**"), in its capacity as data controller, in accordance with Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data ("**Regulation**"), as well as Legislative Decree No. 196/2003, as subsequently amended by Legislative Decree No. 101/2018 ("**Privacy Code**" and, together with the Regulation, "**Privacy Legislation**").

The categories of Personal Data processed by the Company, in paper and/or electronic or digital form, are listed below:

first name, last name, email address, telephone number, company name, tax code, VAT number, and identity documents of the operators participating in the Platform and their contact persons (i.e., users registered in the "Ecosistema Cargo City Malpensa" application, such as freight forwarders, carriers, customs brokers, off-airport handlers, and cargo handlers).

1. Purposes and legal basis for the processing of Personal Data

Personal Data are collected and processed by SEA in compliance with the Privacy Legislation for the purpose of issuing user accounts for use of the Platform and carrying out all preparatory and related activities ("**Purpose**").

The legal basis for the processing is the obligation to register on the Platform imposed by the Malpensa Airport Regulations on all parties operating in the cargo area of Milan Malpensa Airport ("**Operators**", individually an "**Operator**").

Where the Personal Data of data subjects who act as contact persons for Operators are provided to SEA by the Operators, or in any case where Personal Data are not collected directly from the data subject, the natural or legal person that provided the Personal Data to SEA is required to inform the data subject of the contents of this document.

2. Disclosure of Personal Data

Personal Data will be disclosed to third parties where disclosure is required by law, including for the prevention and prosecution of any unlawful activity.

Personal Data will be disclosed solely for the pursuit of the Purpose to SEA employees, collaborators, and consultants, and to third-party companies whose services the Company uses for that Purpose. The current list of third-party companies appointed as data processors under the Regulation is available at the Company's registered office. Except as provided above, Personal Data will not be disclosed to an unspecified number of recipients and, in any event, will not be disseminated or otherwise made publicly available.

3. Mandatory or optional provision of Personal Data

Providing Personal Data to the Company is mandatory for the pursuit of the Purpose. Failure to provide, or partial or inaccurate provision of, Personal Data may result in (i) the Company being unable to provide credentials for access to the Platform and/or (ii) the Company needing to obtain



complete and/or correct Personal Data from third parties, where required or permitted by law, regulations, or orders of public authorities.

In any event, the data subject has the right to object at any time to the processing of their Personal Data. It is understood that, where the data subject objects to the processing of Personal Data and no legal obligations to the contrary apply, the Company will no longer be able to process the Personal Data and access to the Platform may be denied or revoked.

4. Transfer of Personal Data

Personal Data are not processed outside the European Union.

5. Retention period for Personal Data

Personal Data will be retained in accordance with the principle of proportionality and for as long as necessary to pursue the Purpose, or for as long as the data subject and/or Operator uses the Platform and/or operates in the cargo area.

6. Data Protection Officer (DPO)

The Data Protection Officer may be contacted, including for the exercise of data subjects' rights under Articles 15-22 of the Regulation, by email at privacy@seamilano.eu.

7. Data subject rights

With respect to the processing of Personal Data, each data subject may exercise the rights under Articles 15-22 of the Regulation (the right to obtain rectification, completion or erasure - the so-called right to be forgotten - restriction of processing, portability of Personal Data, and the right to object to the processing of Personal Data, including profiling), by submitting a request to the Data Protection Officer at privacy@seamilano.eu or by ordinary mail, for the attention of the Data Protection Officer, at SEA's registered office at Milan Linate Airport, Segrate (Milan).

The data subject may also lodge a complaint regarding the processing of Personal Data with the competent supervisory authority (the Italian Data Protection Authority - Garante per la Protezione dei Dati Personali).