

Privacy Policy Autism Project

Pursuant to articles 13 and 14, GDPR (Regulation (EU) 2016/679 "GDPR") the following information is provided in relation to the "Autism Project".

The service, designed by ENAC (Italian Civil Aviation Authority) with the collaboration of sector associations and airport management companies, is aimed at providing recommendations and suggestions to companions to help children and adults with autism face the travel journey serenely.

1. DATA CONTROLLER

ADR Assistance s.r.l. with registered office in Via Pier Paolo Racchetti, 1 - 00054 Fiumicino (Rome), a subsidiary company of the airport Operator Aeroporti di Roma S.p.A., hereinafter also referred to as ADR Assistance or "the Controller".

2. DATA PROTECTION OFFICER

ADR Assistance has appointed a Data Protection Officer. The contact details of the Data Protection Officer are available at www.adr.it.

3. PURPOSE AND LEGAL BASIS OF THE PROCESSING

ADR Assistance processes personal data¹ of the passenger for whom assistance is requested and of the applicants in order to provide the service and guarantee an adequate and personalised support aimed at meeting the individual's needs, assisting the family and/or the companion in the preparation and preliminary stages of air travel, as well as to plan a familiarisation visit to the airport, including the presence of an assistant educator.

The processing of personal data (including any information ascribable to the special categories referred to in article 9, GDPR) is carried out in order to manage and provide the request for assistance in compliance with the provisions of current legislation (including Regulation EC No. 1107/2006) pursuant to article 6.1, letter c, and article 9.2, letter b., GDPR.

In case of refusal by the data subject to the data processing, it will not be possible to provide the requested assistance service.

4. TYPES OF DATA PROCESSED

Data processed by ADR Assistance include personal data referable to the autistic person (who may also be a minor) as well as to the companion/holder of parental responsibility such as: first name, surname, contact details (e.g. telephone number and e-mail address) date and flight number.

¹ Personal data shall be understood under the GDPR as: "any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an on-line identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

The GDPR defines special categories of personal data as those capable of revealing "racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, [...] genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation".

At the same time, ADR Assistance informs that, in the context of receiving the request and providing the assistance service, it may process data suitable to reveal the health state of the data subject that can be ascribed to the special categories of data referred to in art. 9, GDPR in order to meet the special needs of the person with autism during the preparation and preliminary stages of air travel.

5. PROCESSING METHODS

Personal data are processed in compliance with the regulations in force by means of manual, IT and electronic tools, with logic strictly associated with the purpose above mentioned, in order to guarantee the security and confidentiality of the data.

6. DATA RETENTION PERIOD

Personal data are retained only for the time necessary for the purposes for which they are collected in compliance with the principle of minimisation pursuant to art. 5.1, letter c GDPR and for the additional prescriptive period applicable, except for the possibility of retaining them for a further period in the event of disputes and/or litigation.

7. DATA RECIPIENTS

For the pursuing of the purposes above mentioned, only employees and collaborators of the Data Controller authorised to carry out processing operations to meet the purposes set out in point 3 and who act as authorised to the processing, may become aware of the personal data provided.

In compliance with possible legal obligations, personal data may also be communicated by the Controller to the competent Public Authorities, which will act as (autonomous) data controllers.

Under no circumstances will your personal data be disseminated.

8. NON - EU DATA TRANSFER

Personal data will not be disclosed and/or communicated to third parties located outside of the European Economic Area.

9. RIGHTS OF THE DATA SUBJECTS

Lastly, please be informed that articles 15-22 of the GDPR give data subjects the possibility to exercise specific rights under certain conditions; data subjects can obtain, from the Data Controller: access, rectification, erasure, restriction of processing, withdrawal of consent as well as the portability of data concerning them.

Data subjects also have the right to object to the processing. In the event that the right to object is exercised, the Data Controller reserves the right not to proceed with the request and, therefore, to continue the processing, in the event that there are compelling legitimate reasons to proceed with the processing that prevail over the interests, rights and freedom of the data subject.

The aforementioned rights may be exercised by making a request addressed without formalities to the Data Protection Officer (DPO) at dpo@adr.it.

The data subjects right to file a complaint with the Italian Data Protection Authority pursuant to Article 77, GDPR remains unaffected.

The Data Controller reserves the right to update this policy.

Date of last update

August 2023