






INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA OF EXTERNAL SYSTEM ADMINISTRATORS PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 ("GDPR")

Aeroporto Guglielmo Marconi di Bologna S.p.A. (hereinafter referred to as the "Controller" or "AdB"), pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter "GDPR"), provides you with information regarding the processing of personal data (hereinafter "Data") concerning you, carried out through the Privileged Access Management system (hereinafter "PAM") implemented by AdB for managing privileged access to its IT infrastructure. This access is granted to you due to the provision of services under the contract concluded by the Controller with the company (hereinafter "Contractor") of which you are an employee/collaborator.

	DATA CONTROLLER	Aeroporto Guglielmo Marconi di Bologna S.p.A. Registered Office: Via Triumvirato, n. 84, 40132 Bologna (BO) E-mail: aeroporto.marconi@pec.bologna-airport.it
	DATA PROTECTION OFFICER	The Controller has appointed its own Data Protection Officer (DPO), who can be contacted at the following email address: dpo@bologna-airport.it

	CATEGORIES OF PERSONAL DATA PROCESSED	
	The Data that may be collected and processed by the Controller in the context of managing privileged access include, by way of example and not limited to, first name, last name, affiliated company and role, username and password, logs, recordings (video and text) of accesses and actions/commands issued through connections via Remote Desktop Protocol (hereinafter "RDP"), Secure Shell (hereinafter "SSH"), and Hyper Text Transfer Protocol (hereinafter "HTTPS")	

	WHY ARE YOUR PERSONAL DATA PROCESSED AND WHAT IS THE LEGAL BASIS FOR THE PROCESSING?		HOW LONG DO WE RETAIN PERSONAL DATA?
To create and manage the accounts necessary for accessing AdB's IT infrastructure and to allow the execution of the services provided under the contract between AdB and the Contractor, of which the System Administrator is an employee/collaborator.	The legal basis for the processing is Article 6(1)(b) of the GDPR, namely the performance of a contract		The Data collected through the PAM system, including logs and recordings (video and text) of accesses and actions/commands issued by System Administrators, are retained for 8 months from the time of their collection.
To comply with the provisions of the Data Protection Authority's measure "<i>Measures and precautions prescribed for data controllers processing data using electronic tools regarding the assignment of system administrator functions</i>" dated November 27, 2008, concerning the obligations for the collection and retention of System Administrators' logs.	The legal basis for the processing is Article 6(1)(c) of the GDPR, namely the compliance with a legal obligation to which the data controller is subject.		The Data collected and processed for the management of accounts necessary for accessing the IT infrastructure will be retained for the duration of the contractual relationship between AdB and the Contractor and, after its termination, for one month in order to proceed with the deactivation of the account and its subsequent deletion. If, during the contractual relationship, the Contractor communicates changes in the assigned personnel, AdB will proceed with the deactivation of the account and its subsequent deletion within one month.
To preserve the security of AdB's information assets and monitor access to the IT infrastructure through recordings (video and text) of accesses and actions/commands executed by System Administrators via RDP, SSH, and HTTPS connections.	The legal basis for the processing is Article 6(1)(f) of the GDPR, namely the legitimate interest of the Controller in the protection and monitoring of its information system.		
If necessary, to establish, exercise, or defend the Controller's rights in legal proceedings.	The legal basis for the processing is Article 6(1)(f) of the GDPR, namely the legitimate interest of the Controller in exercising its rights in legal proceedings.		In the event of legal proceedings, personal data will be retained for the entire duration of the litigation, until the expiration of the terms for filing appeals

and/or until a final judgment is rendered.

Once the above retention periods have expired, the Data will be destroyed, deleted, or anonymized, in accordance with technical deletion and backup procedures.

SOURCE AND NATURE OF DATA PROVISION



Your Data may be obtained by the Controller through two methods: a) directly from you; b) from the Contractor. The provision of Data is necessary to allow access to the Controller's IT infrastructure. Any refusal to provide the Data would preclude the possibility of accessing the Controller's systems and, consequently, of providing the services under the contract between AdB and the Contractor.

PERSON AUTHORISED TO PROCESS PERSONAL DATA



Your Data may be processed by the Company's staff and operators responsible for pursuing the aforementioned purposes, who have been expressly authorized to process the data by the Controller, have received appropriate operational instructions, and are bound by professional confidentiality.

DATA RECIPIENT



Your Data may be disclosed to entities acting as independent data controllers (e.g., authorities, etc.).

The Data may also be processed on behalf of the Company by external entities designated as **Data Processors** pursuant to Article 28 of the GDPR, who are given appropriate operational instructions, including companies that provide support for the implementation and maintenance of the information system and business applications.

TRANSFER OF PERSONAL DATA TO NON-EU COUNTRIES



Some Data are shared with recipients who may be located outside the European Economic Area. The Controller ensures that the processing of Data by these recipients is carried out in compliance with the GDPR. Indeed, transfers may be based on an adequacy decision, the standard contractual clauses approved by the European Commission, or another appropriate legal basis.

DATA SUBJECT'S RIGHTS



By contacting the Controller at the email address comitato_data_protection@bologna-airport.it, the data subject may request, at any time:

- Access to their Data (Art. 15 GDPR);
- Rectification and integration of the Data (Art. 16 GDPR);
- Erasure of the Data (Art. 17 GDPR);
- Restriction of processing (Art. 18 GDPR);
- Receipt of the Data in a structured, commonly used, and machine-readable format and, if technically feasible, to have them transmitted to another controller without hindrance ("right to data portability", Art. 20 GDPR);
- Objection to processing in cases of the Controller's legitimate interest (Art. 21 GDPR).

The data subject also has the right to lodge a complaint with the competent supervisory authority, pursuant to Art. 77 of the GDPR, if they believe that the processing of their Data is in violation of the applicable law