



Memorandum for boarding using facial recognition technology

Introduction:

Pursuant to the applicable regulations on Personal Data Protection and Processing, specifically Article 13 of the European Regulation 2016/679 (GDPR), and Italian Legislative Decree 193/2003 (Privacy Code), together with their subsequent amendments and additions, the following information memorandum is provided in relation to the processing of personal data that is carried out if you choose the boarding method using facial recognition technology.

1. Data Controller and Data Protection Officer.

SAC S.p.A. informs that the Data Controller, i.e. the entity that is responsible for decisions related to the purpose, the methods and the security of personal data is S.A.C. - Società Aeroporto Catania S.p.A., with registered offices in Catania, Fontanarossa Airport.

2. Data Protection Officer

The Data Protection Officer, also known by the acronym DPO, monitors compliance with the regulations on personal data and cooperates with the supervisory authority (Garante per la Protezione dei Dati Personali a.k.a the Italian Data Protection Authority). The contact email of the Data Protection Officer is: dpo@aeroporto.catania.it.

3. Purpose of data processing

If you choose the boarding method using facial recognition technology, SAC S.p.A. will process the following personal data that you provide:

- Identity card or Passport (which contain a document identification code, your name, your surname, your photograph and the document expiry date);
- Boarding Pass and the data it contains, (date and flight number you booked, airline, seat number and sequence number) which are necessary to enable the usual airport checks and a consistency check between the data shown in your identity document and your boarding pass.
- Biometric data related to the characteristics of your face: the image of your face taken from your identity document or your passport to compare with the biometric model of your face, acquired through a system that captures facial traits, by measuring them and transforming them into a numerical code which cannot be traced back to the original image that was acquired and which, following a positive comparison with the image obtained from the digital photo acquired from the identity document, is saved in encrypted form and transmitted to an electronic archive held on an SAC S.P.A. Server, which is protected to a high security level (SAC S.P.A. is in possession of ISO 27.001 IT security certification).

4. Purpose of Data Processing

Personal Data is acquired and processed for the sole purpose of streamlining and speeding up the identification operations as required by the applicable legislation and in relation to security checks, for the purpose of flight embarkation. The collection of data will be adequate, pertinent and limited to the extent necessary with respect to the purpose, in accordance with the principles of minimization, necessity and proportionality of the data processing.

5. Optional nature of the provision of Personal Data for boarding purposes using facial recognition

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The granting of personal and biometric data by departing passengers is entirely optional. Departing passengers remain free to use the usual methods of accessing airport departure gates, by having the boarding pass and the identity document or passport read by an airport operator, following the conventional procedure.

The processing of a passenger's biometric data related to facial characteristics, which are necessary for the purpose of facial recognition, can only be carried out by SAC S.P.A. if the passenger who intends to avail himself or herself of the biometric detection system has given his or her consent.

6. Automated process

Opting for identification by means of facial recognition technology implies that identity checking is carried out automatically (validity of your identity document, correspondence with boarding card data and correspondence between the image in your identity document and your face).

In the event that the identification process does not have a positive outcome, then boarding operations will be carried out with the usual conventional methods.

7. Data transmission

For the above listed purposes personal data can be made available to the following parties:

1. employees of SAC S.P.A., on the basis of instructions received from SAC S.P.A. and under the strict control of SAC S.P.A.;
2. consultants or professionals, who collaborate with SAC S.P.A., including the supplier of the facial recognition system, that also takes care of management and maintenance of the system. These parties operate for and on behalf of SAC S.P.A., as Data Protection Officers.
3. With exclusive regard to personal data related to boarding passes, to those parties (including public authorities) that have access to personal data by virtue of legislative or administrative provisions.

Personal Data shall be subject to the highest security standards and shall only be stored in an encrypted format. The Personal Data shall under no circumstances be disseminated, or in any way, communicated to an unspecified number of entities.

The above data shall not be transferred to entities in Countries outside the EU.

8. Personal Data Retention Period

Personal Data will be subject to the highest security standards and will be stored exclusively in encrypted format, for a very limited period determined to be strictly necessary for the purpose for which it was collected. In particular:

- 1) The data related to your boarding pass will be deleted as soon as your flight takes off and therefore it will be kept, encrypted, for the time that elapses from registration in the system until the flight in question takes off. Such data, may be disclosed to judicial authorities to fulfil a legal obligation.
- 2) The identity document or passport data that is acquired during the registration phase at the airport is stored in two ways:

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- a. in relation to each flight, data will be kept for the time that elapses between registration and take off and, in any case, for a period of time that is always less than 24 hours;
 - b. in the case of registration of a "frequent flyer", subject to specific consent, the data will be kept for a period of time that does not exceed 4 months.
- 3) The facial recognition data acquired during registration is stored in two ways:
- a. in relation to each flight, subject to specific consent, data will be kept in encrypted form for the time that elapses between airport registration and take off and, in any case, for a period of time that is always less than 24 hours;
 - b. in the case of registration of a "frequent flyer", subject to specific consent, the data will be kept encrypted for a period of time that does not exceed 4 months.

After these periods, all personal data will be irreversibly deleted.

9. Data Subject's rights.

In compliance with the technical specifications of the system, Articles 15-22 of the GDPR confer upon data subjects the ability to exercise specific rights. The data subject has the right to access, rectify, integrate, erase (right to be forgotten), limit the processing of, and transfer personal data from the Data Controller. In addition, a data subject has the right to revoke consent and refuse the processing of personal data, including verbally, and they can request to carry out boarding procedures using the traditional methods. They can also exercise their rights by means of a request addressed to the Data Protection Officer (DPO), whose e-mail address is: dpo@aeroporto.catania.it. Furthermore, this is without prejudice to the right to lodge a complaint with the Data Protection Authority for the protection of personal data pursuant to Article 77 of the GDPR whenever deemed necessary for the protection of one's rights in this field.

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