



## PRIVACY NOTICE - CAR PARK USERS

As per Art. 13 of EU Regulation 2016/679 (GDPR), the company **Marco Polo Park S.r.l.** with registered office in Viale G. Galilei 30/1, Tessera Venice, as **Data Controller**, (hereinafter "MPP" or "Controller") provides the following information for the data processed by the same: **car park users at Venice and Treviso Airports.**

### Data processing procedures



The data referred to in this Privacy Notice are processed on paper and electronically by MPP's internal staff, who are responsible for managing the individual tasks, and by staff of the SAVE Group's companies (which MPP belongs to) who provide intra-group services, as well as by external parties as shown in the table below with regard to each category of processing.

### Automated decision-making / profiling



With the exception of what is expressly stated in the individual processing operations referred to in the table below, MPP does not carry out automated decision-making processes or profiling with the data acquired on the basis of this information notice.

### Transfer of data to Third Countries

Any data transfer to Third Countries is performed as per Art. 44 and ff. of GDPR

### Granting and withdrawal of consent. Rights of the Data Subject

Except as expressly stated in the table below with regard to individual processing, the provision of data is required for the execution of the contractual relationship and/or legal obligation. Failure to provide the data will make it impossible to continue with the purposes indicated.



If specific consent is given to the processing of personal data, the person concerned may withdraw the consent itself without prejudice to the legitimate use of the data for the purposes of fulfilling the obligations resulting from the service provided during the period of consent. Such withdrawal shall be expressed sending a communication to the addresses hereinbelow or, for users logged in MPP's website, also through the reserved area of such website.

The Data Subject has the right to request access their personal data, the rectification, erasure, limitation of such data, to object to the processing of their personal data, as well as the portability of their data, where this is possible.

### Complaint to the Supervisor Authority



The Data Subject may lodge a complaint with a Data Protection Supervisor Authority, choosing between that of the EU State where they have their habitual residence, or in the EU State where they work or where the alleged violation has occurred.

### Data Protection Officer (DPO) Contacts

To request the list of the offices and officers in charge of the processing, of the foreign Countries to which your data is transferred, the mechanisms and safeguards for the transfer of data pursuant to Art. 44 ff GDPR, to exercise the revocation of consent pursuant to Art. 7 GDPR as well as your other rights under EU Reg. 2016/679, you can write to:

**MARCO POLO PARK S.r.l. - Privacy Committee**  
**viale Galileo Galilei 30/1, 30173 Venezia Tessera (Italia)**  
**Certified email: [marcopolopark@legalmail.it](mailto:marcopolopark@legalmail.it)**

Contact the MPP's (and SAVE Group's) DPO by email: [privacy@grupposave.com](mailto:privacy@grupposave.com)

## List of processings made

DESCRIPTION OF THE DATA PROCESSED	PURPOSE OF THE PROCESSING, LEGAL BASIS AND CONSENT	PERIOD OF DATA RETENTION	SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED
-----------------------------------	--	--------------------------	---



### 1. Video surveillance system (CCTV)

Images recorded by the video surveillance systems (CCTV) installed at the entrance/exit of car parks, cash desk and cash machines.	Organisational and production needs, workplace safety and security of areas, protection of company assets, prevention of offences.  Legal basis: legitimate interest of the data controller.	The images are kept for 7 days, unless they are set aside for the protection of rights or for other legal reasons (in which case they are kept for the time necessary to carry out the purpose for which they were saved and, at the end of the same, for the further period of prescription of the law for defence in court (10 years from the last use and/or event interrupting the prescrip-	Company that manages airport security; handling companies; air carriers; public bodies and law enforcement agencies; consultants; external lawyers; brokers and insurance companies; systems maintenance companies; third parties with the right to view images.
--	--	--	--



### 2. Services to Passengers with Reduced Mobility (PRM)

Personal and special data where publicly declared (health) for passengers with reduced mobility for the free use of parking areas.	Operation of passenger services as requested and in accordance with PRM regulations. (free car parks and services operated by the airport management company)  Legal basis: contractual and legal fulfilment and public interest obligations.	The data are kept for the time necessary to perform the service. After this period, the data will be kept anonymously for statistical purposes without any time restrictions.	Airport management company; systems maintenance companies.
--	---	---	--

## List of processings made

DESCRIPTION OF THE DATA PROCESSED	PURPOSE OF THE PROCESSING, LEGAL BASIS AND CONSENT	PERIOD OF DATA RETENTION	SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED
-----------------------------------	--	--------------------------	---



### 3. Customer Care

Identifying and contact information, or other information provided by interested parties for assistance in dealing with lost property or in requesting information. Data is acquired also by recording intercom conversations at the entrance/exit of car parks.	Need to provide and manage the requested service,. It includes service communications about car parks operation.  Legal basis: Contractual obligation and legitimate interest of the data controller.	The data are kept for the time necessary to perform the service and, at the end of the same, for the further statutory prescription period relating to the retention of contracts and administrative data and/or for legal defence (10 years from the last use and/or event interrupting the prescription). The intercom recording is kept for 30	Systems maintenance companies; companies providing services related to the parking (e.g. ticketing, customer services).
--	---	---	---



### 4. Management of complaints, claims and accidents

Identifying and contact data, other data provided by the interested parties at the time of the event.	Need to respond to complaint/notifications and protection of the rights of the person concerned and the Data Controller,  Legal basis: contractual legal obligations.	The data are kept for the time necessary for the purpose at the end of which for the further statutory prescription period for the retention of contracts and administrative data and/or for legal defence (10 years from the last use and/or event interrupting the prescription). After this period, the data will be kept in anonymous form for statistical purposes without	Public bodies and law enforcement agencies; consultants; external lawyers; brokers and insurance companies; systems maintenance companies.
---	---	---	--

## List of processings made

DESCRIPTION OF THE DATA PROCESSED	PURPOSE OF THE PROCESSING, LEGAL BASIS AND CONSENT	PERIOD OF DATA RETENTION	SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED
-----------------------------------	--	--------------------------	---



### 5. Management of parking and mobility. Respect of car park regulation

Identifying and contact information, car plates	Control of mobility and parking in car park areas. Need to maintain parks and improve services. Removal of cars in parks. Verifying the respect of car parks regulations.. Legal basis: Contractual obligation and legitimate interest of the data controller	The data are kept for the time necessary to perform the service and, at the end of the same, for the further statutory prescription period as per point 4)	Providers of services (e.g tow truck); providers of access systems; public bodies and law enforcement agencies; system maintenance companies. For Venezia airport only, the data concerning car access to the park areas may be communicated to the local Police Force of the Municipality of Venice for the purposes of ascertaining the stay in the controlled traffic area of the airport.
---	--	--	--



### 6. Car parking and payment

Identifying and contact information, billing and payment data, car plates.	Provision of the service requested and payment of parking. The processing of access data is performed by automated means at the entrance/exit of car parks. Legal basis: contractual obligation and legal obligation.	Car plated images are kept for 7 days from the exit date. The data are kept for the time necessary to perform the purpose and at the end of which, for the further statutory prescription period for the retention of contracts and administrative data and/or for legal defence (10 years from the last use and/or event interrupting the prescription). After this period, the data will be kept in anonymous form for statistical purposes without time limitations.	Providers of means of payment; Providers of access systems; system maintenance companies; companies providing services related to the parking (e.g. ticketing, customer services).
--	--	---	--

## List of processings made

DESCRIPTION OF THE DATA PROCESSED	PURPOSE OF THE PROCESSING, LEGAL BASIS AND CONSENT	PERIOD OF DATA RETENTION	SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED
-----------------------------------	--	--------------------------	---



### 7. Newsletter and marketing communications from MPP

Contact details (email, mobile phones), Identifying data.	Commercial., promotional and marketing communications from MPP (email/newsletter/, SMS) about MPP's services and MPP partners' special offers. Legal basis: Data Subject's consent	Data may be stored for the time necessary for the performance of the purpose (unless withdrawal of consent) and in any case for a maximum period of 36 months (unless renewal of the consent).	Provider of communication services//newsletter/SMS; system maintenance companies
---	---	--	--



### 8. Newsletter and marketing communications from SAVE Group

Contact details (email, mobile phones), Identifying data.	Commercial., promotional and marketing communications from other companies of SAVE Group (email/newsletter/, SMS) about SAVE Group's and SAVE Group partners' services and activities Legal basis: Data Subject's consent	Data may be stored for the time necessary for the performance of the purpose (unless withdrawal of consent) and in any case for a maximum period of 36 months (unless renewal of the consent).	Companies of SAVE Group that send communications (SAVE S.p.A., AerTre S.p.A. Aeroporto Valerio Catullo di Verona Villafranca S.p.A.); providers of communication services//newsletter/SMS; system maintenance companies
---	--	--	---