



PRIVACY POLICY STATEMENT pursuant to articles 13 and 14 of Regulation (EU) 2016/679 with regard to the processing of complaints/reports submitted to SETA S.p.A.

1. DATA CONTROLLER

The Data Controller is Seta S.p.A. – Società Emiliana Trasporti Autofiloviari S.p.A. with registered office at in Modena (Italy) at Strada Sant'Anna, 210 [Tel. +39 059 416711 - certified email: segreteria@pec.setaweb.it].

Seta S.p.A., in its capacity of Data Controller with regard to the processing of your personal data pursuant to Regulation (EU) 2016/679 on the "protection of natural persons with regard to the processing of personal data and on the free movement of such data", hereby informs you that your personal data will be processed in a fair, lawful, transparent manner which protects your privacy and your rights. With regard to the collection and use of personal data, the Data Controller hereby informs you that the data are collected via the compilation of the web form provided on the <https://setaweb.it> website, or of the paper form available at the ticket offices managed by external suppliers.

2. DATA CONTROLLER'S REPRESENTATIVE

The Data Controller has not appointed a Representative within its organisation since this is not necessary under the provisions of the Regulation.

3. DATA PROTECTION OFFICER

Pursuant to art.37 and following articles of Regulation (EU) 2016/679, Seta S.p.A. has selected and appointed a Data Protection Officer (D.P.O.).

The D.P.O. is domiciled for the purposes of this role at the offices of Seta S.p.A., Strada Sant'Anna, 210, 41122 Modena (Italy), [Tel. +39 059 416711 - certified email: segreteria@pec.setaweb.it - e-mail: dpo.privacy@setaweb.it].

4. PURPOSES OF THE DATA PROCESSING AND DATA PROCESSED

The types of processing covered by this privacy policy statement relate to the submission of reports/complaints by customers. Your personal data (personal details and contacts) or those of your representative are collected and processed for the following purposes: management of reports/complaints/enquiries relating to the service used by the data subject or communications received by the company

The provision of minimal personal details, a certified telephone number and a verified email address is compulsory: therefore, refusal to contribute even some of these data prevents the start of processing for the aforesaid purposes. No consideration will ever be given to anonymous reports.

The data collected may also be used for statistical analysis, performed in aggregate, anonymous form, i.e. without using identification data.

5. LEGAL BASIS AND LAWFULNESS OF PROCESSING

The legal basis of the processing consists of the legitimate interest of the Data Controller (art. 6 co 1, sub. f) of Regulation (EU) 2016/679) in the good management of the Local Public Transport service and, if the person submitting the report is a passenger, of the need to execute a contract to which the data subject is a party (art. 6 co. 1, sub. b) of Regulation (EU) 2016/679).

6. DATA PROCESSING PROCEDURES

All processing takes place with the adoption of adequate technical and organisational security measures, in accordance with art. 32 of Regulation (EU) 2016/679.

All data are processed in paper and digital form and measures are implemented to minimise the processing, with regard to the type of data, access authorisations and storage times.

7. RECIPIENTS OF THE PROCESSED PERSONAL DATA

For the purposes set forth in Point 4 of this Privacy Policy Statement, your data will only be processed by authorised personnel (belonging to the Data Controller's organisation and/or external) for the execution of the activities necessary for the management of complaints/reports relating to the Local Public Transport Service in the Piacenza, Reggio Emilia and Modena districts (managers, directors and auditors, protocol and administration office staff, Customer Care Office manager and staff, managers of the departments concerned and their staff).

For the purposes set forth in Point 4 of this privacy policy statement, your data may also be disclosed to external entities involved or concerned in the circumstances reported.

To guarantee that processing takes place in accordance with principles of integrity, security and minimisation, your data may be disclosed to the providers of system administrator services.

However, all data recipients are required to comply with data protection regulations.

8. TRANSFER OF DATA TO A THIRD COUNTRY

Your data will not be transferred to a third country or an International Organisation (country outside the European Union).

9. PERSONAL DATA STORAGE PERIOD

A record is made of the receipt and disposal of your personal data, which will be stored for the period typically used in public sector filing systems.

10. RIGHTS OF THE DATA SUBJECT

You are entitled to return the season ticket for the Public Transport service within 15 days after the date of its receipt, and to apply to the Data Controller for access to or the erasure, communication, updating or rectification of your personal data, to object to their processing, or to request their integration, the restriction of their processing, their portability, or knowledge of any breach of their confidentiality, and in general to exercise all the rights envisaged by art. 13 and following articles of Regulation (EU) 2016/679 and art. 1333 of the Italian Civil Code. Requests for erasure and objections to processing will only be accepted if public interest purposes do not apply.

All the aforesaid rights may be exercised at any time by writing to the Data Controller by certified email at segreteria@pec.setaweb.it or by Registered Letter with return receipt to be sent to Seta S.p.A., Strada Sant'Anna, 210, 41122 Modena (Italy).

11. SUPERVISORY AUTHORITY

If you maintain that the processing of your personal data is in breach of the relevant legislation, you may lodge a complaint with a supervisory authority, which in Italy is the "Garante per la protezione dei dati personali" [garanteprivacy.it].

12. AUTOMATED DECISION-MAKING

Your data will not be inserted in any automated decision-making process

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