

## Privacy Policy FlyNap

### Introduction

This Policy aims to describe the management methods regarding the processing of personal data of users/visitors of the FlyNAP app. We recommend reading this privacy policy carefully before providing any data.

This communication is provided in accordance with European Union legislation on personal data processing and the Italian Privacy Code (art. 13 of Legislative Decree No. 196/2003) and the European regulation under EU Regulation No. 2016/679 (GDPR), art. 13.

### Ownership

The data controller is GESAC S.P.A., located at Capodichino Airport - 80144 Naples (hereinafter referred to simply as "Controller"). The updated list of data processors is available upon request at [privacy@gesac.it](mailto:privacy@gesac.it).

### Scope of this Policy

This Privacy Policy concerns the FlyNAP app and does not extend to other websites or apps that are not related to GESAC S.p.A. that the user may visit through links.

### Policy and Information

The FlyNAP app serves:

- An informative function regarding the activities carried out by GESAC S.p.A. for Naples Airport and Salerno Airport.
- An interaction function with users for airport and related services.  
In cases where it is necessary to provide personal data of the user (as the data subject), such as in the sections "Newsletter," "FlyForYou," "Recruitment," and "Complaints and Suggestions," users are asked to fill out a data collection form. In these cases, specific privacy information is provided that clarifies the use of the data and other indications required by law. We recommend reading this information before providing data.  
Additionally, in limited cases where it is necessary to collect personal information for other purposes, this will be clearly highlighted in the legal notices to ensure transparency and awareness for the user.

### Navigation Data

The IT systems and software procedures used to operate this app acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes: IP addresses, the type of browser used, the operating system, the domain name, and the addresses of websites from which access or exit was made, information about the pages visited by users within the app, access time, duration on each page, internal path analysis, and other parameters related to the user's operating system and IT environment.

Such technical/informatic data are collected and used exclusively in an aggregated and non-identifiable manner; they may be used to ascertain responsibility in the event of hypothetical cyber-crimes against the app or at the request of public authorities.

### Cookies (Reference)

Regarding the installation of cookies by this app, please refer to the Cookie policy.

### Redirect to External Sites

From this app, it may be possible to connect - via specific links - to other websites of third-party companies.

GESAC S.p.A. declines any responsibility regarding the management of personal data by third-party sites and regarding the management of authentication credentials provided by third parties.

#### **Data Processing and Storage Methods**

The processing of personal data is mainly carried out using electronic procedures and supports for the time strictly necessary to achieve the purposes for which the data were collected. However, the user has the right to obtain the deletion of their data in the presence of legitimate reasons.

#### **Voluntariness of Data Provision**

The provision of personal data requested from the data subject - unless otherwise specified - is optional; however, failure to provide them may result in the inability to obtain what is requested or to carry out the indicated activity.

#### **Location of Data Processing**

The processing related to the services of the FlyNAP app takes place at the company's headquarters, which manages the relevant server. Personal data are handled only by technical personnel of the company, specifically appointed for processing, or by those responsible for occasional maintenance operations.

#### **Data Circulation and Dissemination**

Only individuals acting on behalf of the Controller, specifically designated as data managers, coordinators, or responsible for managing the requested service, have access to the personal data acquired through this app; such data are not disseminated. More detailed information about the names of privacy roles can be requested by writing to [privacy@gesac.it](mailto:privacy@gesac.it).

#### **Foreign Data Flows**

Given the international nature of GESAC S.p.A.'s activities, data may be sent abroad and processed, still for the above purposes, by the Controller's suppliers located in the European Union and third countries. In these cases, the transmission of data abroad is subject to specific guarantees for the protection of personal data through the adoption of standard contractual clauses on data protection approved by the European Commission or similar guarantees.

#### **Rights for the Protection of Personal Data**

Data subjects, pursuant to Articles 15 and following of the GDPR, have the right at any time to obtain confirmation of the existence or non-existence of their data and to know its content and origin, verify its accuracy, or request its integration or updating, or rectification. Furthermore, they have the right to request deletion, transformation into anonymous form, or blocking of data processed in violation of the law, as well as to object in any case, for legitimate reasons, to their processing. Requests should be addressed to [privacy@gesac.it](mailto:privacy@gesac.it).

#### **Changes to the Policy**

The eventual entry into force of new sector regulations, as well as the constant review and updating of user services, may necessitate changes to the methods of processing personal data. Therefore, it is possible that our policy may change over time, and we invite visitors to periodically consult this page.