

## PRIVACY POLICY – CUSTOMERS

### Information notice pursuant to Article 13 of the REGULATION (EU) 2016/679 (GDPR) – Processing of personal data collected from data subject

Pursuant to Reg. UE 2016/679 (General Data Protection Regulation) we provide you the due information concerning processing of collected personal data in accordance to art. 13 of the abovementioned Regulation.

**DATA CONTROLLER**, pursuant to artt. 4 and 24 of the Reg. UE 2016/679, is **SOCONOMAR SOCIETA' COMMERCIALE E DI NOLEGGI MARITTIMI S.P.A.**, with legal headquarter in 20133 Milano (MI) - Viale Romagna, 14, VAT no. 00751820150, in person of its legal representative, e-mail [contabilita@soconomar.it](mailto:contabilita@soconomar.it), Phone +39.02.7610744.

**Personal data:** any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can directly or indirectly be identified, in particular by reference to an identifier such as a name, an identification number, a location data, an online identifier or to one or more specific factors to the physical, physiological, genetic, mental, economic, cultural or social identity (C26, C27, C30).

Personal data that will be processed for the mentioned purposes are: -first name, last name, address, tax code, VAT Number related to natural person processed by company for contract conclusion and subsequent fulfilment, in person of the legal representative who enters into an agreement on behalf of, and for the customer, as well as employees/advisors' acting as handlers of him.

### PURPOSES OF PROCESSING | LEGAL BASIS FOR THE PROCESSING | DATA RETENTION | NATURE OF UNDERWRITING

PURPOSES OF PROCESSING	LEGAL BASIS FOR THE PROCESSING	DATA RETENTION	NATURE OF UNDERWRITING
Processing necessary for the fulfilling contractual and precontractual obligations and for related administrative and accounting purposes.	<p><i>Contract</i></p> <p>art. 6 lett. b) GDPR: processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p><i>Legal Obligation</i></p> <p>art. 6 lett. c) GDPR: processing is necessary for compliance with a legal obligation to which the controller is subject to.</p>	10 years or otherwise stated by law Art. 2220 C.C.	Personal data provision is necessary for the above mentioned purposes, in order to draw up the contract between parties and to purposes related to the management of administrative and accounting fulfillments. The refusal will prevent from giving effect to the contract.

### RECIPIENTS OR CATEGORIES OF RECIPIENTS

Your personal data will be processed by third parties contractually involved with the Data Controller, and also with the following third parties: - entities that provide services for the management of the information system and telecommunications networks (including e-mail); - firms or companies which provide assistance and advice; - Public authorities to fulfil legal and regulatory obligations, if requested; in case of administrative and accounting purposes, data could be transmitted to business information companies for the evaluation of solvency and payment habits and/or to other subjects for debts collection. The subjects belonging to the above categories are considered data processor, or are acting independently as data controller. The list of the Data processors is constantly updated and it is available at the legal headquarter of the Data Controller.

### DATA TRANSFER TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANIZATION

Personal data will not be transferred outside the European Union.

### DATA SUBJECT RIGHTS

You may freely exercise your rights at any time under Reg. EU 2016/679 –GDPR, Articles 15, 16, 17, 18, 19, 20, 21, 22 by contacting the Data Controller at the e-mail address [contabilita@soconomar.it](mailto:contabilita@soconomar.it). You have the right, at any time, to obtain from the Data Controller the access to personal data, request their rectification, erasure or processing restriction. Furthermore you have the right to object anytime to your personal data processing (automated meaning included, ex. profiling), as well as to data portability.

Without prejudice to any other administrative or judicial remedy, in case you consider your data processing in contrast with Reg. UE 2016/679, pursuant to article 15 lett. f) of Reg. UE 2016/679, you have the right to lodge a complaint with a supervisory authority – Italian Data Protection Authority ([https://www.garanteprivacy.it/web/guest/home\\_en](https://www.garanteprivacy.it/web/guest/home_en)). In exercising your right to data portability, the Data Controller may provide your personal data in a structured, commonly used and machine-readable format. There is not any automated decision-making.

Last update: 3.06.2019

### DATA CONTROLLER

**SOCONOMAR SOCIETA' COMMERCIALE E DI NOLEGGI MARITTIMI S.P.A.**