

## PERSONAL DATA PROTECTION NOTICE

Pursuant to articles 5-6-7-9-10-12-13-15-16-17-18-20-21-22-77 EU Regulation no. 2016/679

Dear Costumer

(hereinafter referred to as “**the Party Concerned**”).

### 1. WHY THIS NOTICE

Pursuant to articles 5-6-7-9-10-12-13-15-16-17-18-20-21-22-77, EU Regulation no. 2016/679 (hereinafter referred to as “GDPR 2016/679”), on the protection of people’s privacy against any illegal use of their personal data, as well as on the free transfer of personal data, we wish to inform you that, in the fulfilment of the terms and conditions hereunder and for any other purpose as may be specified below, Compagnia Impresa Lavoratori Portuali s.r.l. (VAT Registration Number: 01144390497), duly incorporated in Alfredo Cappellini n.6, 57123 Livorno, Italy, through its acting legal representative, Mr Marco Dalli, born in Livorno on 10.01.1962 (social-security number: DLLMRC62A10E625U), will collect and process your personal data, which will be protected in accordance with the applicable regulations.

Therefore, in this Notice, we wish to give you a clear and transparent picture of what personal data and information we collect and process about our customers and/or suppliers, as part of our agreements.

Therefore, in the next sections, we will explain you how the personal data that Compagnia Impresa Lavoratori Portuali s.r.l. and its employees may come into possession of by entering into this agreement will be used, to what purpose, for how long, how and on what legal grounds, we will remind you of the rights you are conferred as the Party Concerned, and how we make sure the EU General Data Protection Regulation no. 2016/679 is adhered to.

### 2. DATA CONTROLLER (PURSUANT TO ART. 4 GDPR 2016/679)

The Data Controller is **Compagnia Impresa Lavoratori Portuali s.r.l. (VAT Registration Number: 01144390497), duly incorporated in Alfredo Cappellini n.6 57123 Livorno, telephone number 0586 841111, fax number 0586 841690, email dgentili@cilplivorno.it, PEC cilp@legalmail.it**, through its acting legal representative, Mr Marco Dalli, born in Livorno on 10.01.1962 (social-security number: DLLMRC62A10E625U).

(hereinafter referred to as “**C.I.L.P.**”)

The Data Controller has not appointed any Data Protection Officer or DPO.

### 3. WHAT ARE PERSONAL DATA AND WHAT DATA DO WE COLLECT

Under art. 4 no.1 GDPR 2016/679, “Personal Data” means any piece of information that may directly or indirectly help identify someone, in this case You, as a recipient of C.I.L.P.’s services and/or as a supplier to C.I.L.P. and/or as a party to an agreement with C.I.L.P..

In particular, we collect and process only the personal data that we need to enter into the agreement and/or provide the required services, including but not limited to:

- Personal and ID details (name, surname, date and place of birth, social-security number);
- Personal address, telephone number, email and/or certified email);
- Bank details to send or receive money to/from your bank account;
- Generally speaking, any other data or information that may be needed to enter into or fulfil the agreement.

#### **4. PURPOSE (PURSUANT TO ART. 5 GDPR 2016/679)**

Your personal data will be processed for the following purposes:

- Enter into and duly, fully fulfil the agreement as a recipient of C.I.L.P.'s services and/or as a supplier to C.I.L.P.;
- Engage in those operations that are closely related and instrumental to the fulfilment of any formality before entering the agreement;
- Manage the agreement (administration, accounts, customer assistance and/or supplier assistance, complaint management, credit collection, contacts with agents, salespeople, clients and/or contractors, litigations in court or out of court);
- Supply on-demand services;
- Protect the company's assets and defend the company's rights;
- Fulfil any legal requirement or any request from the authorities, as well as adhering to any applicable antifraud, money-laundering and terrorism-financing regulation;
- Fulfil any applicable tax or accounting requirement;

Your personal data may be processed through paper or electronic media (including mobile devices) and insofar as needed to accomplish the above-mentioned purposes.

#### **5. LEGAL GROUNDS**

C.I.L.P. will lawfully process your personal data, in compliance with art. 6 GDPR 2016/679, whenever they must be processed:

- To fulfil an agreement you are a party to or to meet a formality as a prior condition to entering into an agreement;
- To fulfil any legal requirement that C.I.L.P. is bound to meet;
- With your consent;

#### **6. CONSEQUENCES OF NON-DISCLOSURE**

Should you refuse to disclose your personal data In connection with an agreement you are a party to or with the fulfilment of an applicable formality as a prior condition to entering into an agreement or with the fulfilment of any legal requirement (e.g. accounting and tax books), the agreement cannot be finalised.

#### **7. PROCESSING AND STORAGE**

Your personal data will be processed by the Data Controller and/or by specially appointed employees of C.I.L.P., with or without electronic or automatic media, in accordance with art. 32, GDPR 2016/679, and art. 29, GDPR 2016/ 679.

Note that, inspired by lawfulness, correctness, transparency, the restriction of scope and the minimisation of data, pursuant to articles 5-6 GDPR 2016/679, we only collect and process the personal data that are strictly required for the achievement of the purposes listed above at section 4.

Your personal data will be kept for as long as it takes to achieve the purposes for which they have been collected and processed, and thereafter for as long as C.I.L.P. is bound to keep such data for tax purposes or for any other purpose as may be laid down by the applicable laws or regulations.

In particular, we will process your data throughout the term of the agreement and as long as needed to fulfil any requirement or formality associated with the agreement.

In any case, in fulfilment of any applicable regulations, your personal data will be used and kept for as long as such legal requirements need to be met.

## **8. SCOPE OF DISCLOSURE**

We will only disclose your data to the parties we use to perform operations that are required for or instrumental to the purposes listed above at section 4, including, but not limited to:

- Banks, for deposits and payments;
- Revenue offices or public institutes in compliance with any applicable regulation;
- Companies, legal firms, lawyers for the defence of the rights conferred by the agreement;
- Agents, salespeople;
- Clients and/or contractors as part of contracts/subcontracts;
- Consulting firms, consultants, chartered accountants or other firms for the achievement of the aforesaid purposes;
- Banks and insurance companies for the achievement of the aforesaid purposes;
- Data processors in compliance with any applicable regulation;
- Legal or administrative authorities in compliance with any applicable regulation.
- Logistic contractors and other contractors;
- Companies working for us as technical coordinators, IT consultants or technicians;
- Generally speaking, any company that may provide assistance or a service related to the agreement.

We might also disclose your personal data to parties whom such data must be disclosed to according to law and to the banks we work with in order to enter into the agreement. Such parties will process such data as independent Data Controller.

## **9. TRANSFERS OF PERSONAL DATA**

We usually do not transfer your personal data to other countries; however, note that your personal data might be transferred to EU or non-EU countries or to international organisations insofar as needed to achieve the purposes listed above at section 4.

In this case, we will first make sure the recipient acting as a Data Processor will adhere to the provisions of the GDPR, including rules on transfer of personal data.

In particular, we make sure such data are transferred only when appropriate or once the Data Processor has signed a standard EC-approved data-protection clause.

## **10. AUTOMATIC DECISION-MAKING PROCESS, INCLUDING PROFILING**

C.I.L.P. does not use any automatic decision-making process, including profiling, as per article 22, paragraphs 1 and 4, EU Regulation no. 679/2016.

## **11. RIGHTS OF THE PARTY CONCERNED (ARTICLES No. 7-15-16-17-18-19-20-21-77 GDPR 2016/679)**

Pursuant to Articles 15 to 22 GDPR 2016/679, as well as art. 77 GDPR 2016/679, as the Party Concerned you will be entitled, at any time:

- **TO HAVE ACCESS TO YOUR PERSONAL DATA**, i.e. the right to be confirmed whether your personal data are being used or not, and the right to receive any information about such use, in accordance with art. 15 GDPR 2016/679;

- **TO CORRECT YOUR PERSONAL DATA**, i.e. the right to have your data corrected without delay if such data are incomplete or incorrect, in accordance with art. 16 GDPR 2016/679;

- **TO DELETE YOUR PERSONAL DATA**, i.e. the right to have your data deleted from our databases, in accordance with art. 17 GDPR 2016/679,

- When your personal data are no longer required for the purposes for which they have been collected or otherwise used;
- When the Party Concerned withdraws the consent such use is based on and there is no other legal ground for using such data;
- When the Party Concerned opposes to have the personal data used, pursuant to article 21, paragraph 1 GDPR 2016/679, and there is no overriding clause on the use of such data, or when the Party Concerned opposes to have the personal data used, pursuant to article 21, paragraph 2 GDPR 2016/679;
- When the personal data have been unlawfully used;
- When the personal data must be deleted to fulfil some legal requirement laid down by the European Union or by the member state of the Data Controller;
- When the personal data have been collected to provide e-services, under article 8, paragraph 1 GDPR 2016/679.

This will not apply if such data must be used to defend the right to freedom of expression and the right to information, to fulfil a legal requirement, to perform a task in the public interest or to exercise a public power to protect health as a public interest, for filing or statistical purposes, for the establishment, exercise or defence of a legal claim.

- **TO RESTRICT THE USE OF YOUR PERSONAL DATA**, i.e., in accordance with art. 18 GDPR 2016/679, the Party Concerned is entitled to have the use of personal data restricted:

- When the Party Concerned claims that the personal data are incorrect, for as long as it takes the Data Controller to check if the personal data are correct;
- When the personal data are illegally used, and the Party Concerned opposes to have the personal data deleted but wants the use thereof to be restricted;
- When, even if the Data Controller no longer needs the personal data, the Party Concerned still needs them for the establishment, exercise or defence of a legal claim;
- When the Party Concerned has opposed to have the personal data used, pursuant to article 21, paragraph 1 GDPR 2016/679, while waiting to find out whether the legal grounds of the Data Controller outweigh the legal grounds of the Party Concerned;

- **TO OPPOSE TO HAVE YOUR PERSONAL DATA USED**, i.e., in accordance with art. 21 GDPR 2016/679, the Party Concerned is entitled to oppose to have the personal data used, at any time and for any specific or personal reason, unless the Data Controller proves that there are binding reasons to use such data that outweigh the interests, rights and freedoms of the Party Concerned or for the establishment, exercise or defence of a legal claim.

- **TO DATA PORTABILITY**, i.e., in accordance with art. 20 GDPR 2016/679, the Party Concerned is entitled to receive the data from the Data Controller without restrictions, in a standard structured machine-readable format, and transfer them to a different Data Controller;

- **TO WITHDRAW YOUR CONSENT** to have the personal data used, without prejudice to the lawful use of the data, based on your previous consent, in accordance with art. 7 GDPR 2016/679;

**- TO FILE A COMPLAINT with the Data Protection Authority**, in accordance with art. 77 GDPR 2016/679.

The Party Concerned may freely exercise the rights hereunder by sending a written request to **Compagnia Impresa Lavoratori Portuali s.r.l. (VAT Registration Number: 01144390497) to: Alfredo Cappellini n.6, 57123 Livorno**, or by fax to **0586 841690**, or by email to **dgentili@cilplivorno.it**, or by PEC to **cilp@legalmail.it**,