



INFORMATION ON THE PROCESSING OF PERSONAL DATA

This is to inform you, pursuant to articles 12 and 13 of the EU Regulation n. 2016/679 on the "Protection of natural persons with regard to the processing of personal data and on the free movement of such data" (hereinafter Regulation), that, in the context of the commercial relationship with our company, we process a set of personal data related to the your Company.

1. Identity and contact details of the Data Controller

The Data Controllers are d'Amico Società di Navigazione S.p.A. and its group undertakings. The headquarter is based in Rome, Corso d'Italia 35/b.

2. Contact details of the DPO

Address: Corso d'Italia 35/b 00191 Rome – Phone number +39 06 845 611 fax +39 06 98968092
e-mail address dpo@damicoship.com

3. Purposes of the processing

The processing of personal data by d'Amico Società di Navigazione S.p.A. and its group undertakings will be for the purpose of management of the commercial relationship (management of contracts).

In particular, the processing of personal data may be performed for:

- a. the fulfillment of contractual obligations (by way of example the payments provided by the contract through banks or similar organizations);
- b. the compliance with specific legal obligations related to the commercial relationship entered into;
- c. the sending of correspondence by d'Amico Società di Navigazione S.p.A..

4. Legal bases of the processing

The legal basis of the processing is represented by the art.6, letters b) and c) of the Regulation.

b) 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; c) Processing is necessary for compliance with a legal obligation to which the controller is subject.

5. Methods of processing

These data will be processed both by computerized and paper based methods, observing the rules on the protection of personal data, including those relating to data safety.

6. Categories of parties to whom personal data will be disclosed

The personal data you provide may be disclosed to public and private entities relevant to the purposes mentioned above.

The communication of personal data is carried out in accordance with the obligations provided by law as well as by specific powers granted by the parties concerned (such as of crediting of salary into banks). According to this, the personal data can be communicated to Credit Institutes, and any other entity that may request it, always respecting the extent required by law.

Your personal data may also be provided to parties appointed by d'Amico Società di Navigazione S.p.A. and its group undertakings, as External Data Processors for the purposes strictly related to the execution and the management of the contract in place.

It is understood, moreover, the obligation of d'Amico Società di Navigazione S.p.A. and its group undertakings to release information to the Judicial Authority, whenever required.

7. Retention of personal data

The retention of your personal data will be carried out in compliance with security measures used by d'Amico Società di Navigazione S.p.A. and its group undertakings with regard to the protection of data, and the access to these data will be allowed only to subjects involved and designated for their processing.

The criteria used to determine the applicable retention period are: we will retain your personal data for the time (i) necessary for its purpose, (ii) necessary for the completion of the existing commercial relationship, (iii) accepted by interested party and / or (iv) required by applicable laws. Anyway your personal data will be kept until the limitation period of the rights deriving from the commercial relationship.

8. Rights of the data subjects

You can exercise in every moment the rights of art. 13, letter b) and art. 15, 16, 17, 18 and 20 of the Regulation, addressing to DPO, at the contact provided in point n. 2 of this information.

In particular, as a data subject, you will require:

1. The access to the personal data concerning you, according with the art.15 of the Regulation.
2. The rectification of inaccurate personal data concerning you, according with the art.16 of the Regulation.
3. The erasure of personal data concerning you ("right to be forgotten"), according with the art.17 of the Regulation.

4. The restriction of processing of data concerning you, according with art.18 of the Regulation.

We inform you, finally, that you will have the right to object in every moment, according with the art.21 of the Regulation, if one of the situations described by the art.6, paragraph 1, letters e) and f) of the same Regulation occurs.

9. Complaint to the supervisor authority

With regard to art.77 of the Regulation, we remind you that you have the right to lodge a complaint to the supervisor authority if you think that the processing of your data is performed in violation of the provisions of the Regulation.

10. Nature of the processing and obligatoriness of personal data conferment

Many of the processed data are required to perform the obligations arising from legal requirements and to fulfil respective contractual obligations. In some cases, the lack of consent to the processing of personal data may make it impossible for d'Amico Società di Navigazione S.p.A. and its group undertakings to continue the working relationship established.

11. Existence of automated individual decision making in the processing

It is specified that, for the processing of the data, there is **NOT** any kind of automated individual decision-making, according with the art.22 of the Regulation.