



SUBJECT: Information on the processing of personal data of Members in accordance with Articles 13 and 14 of EU Regulation 679/2016, related to the protection of natural persons with regard to the processing of personal data.

In compliance with the provisions of EU Regulation no. 679/2016 ("GDPR"), we wish to inform you that the personal data provided by you or acquired by us as part of our business, necessary to perform the services offered and also provided by you, will be processed in compliance with the regulations on privacy and the principles of fairness, lawfulness, transparency and protection of your privacy and your rights.

1. DATA PROCESSED, PURPOSE OF THE PROCESSING, LEGAL BASIS OF THE PROCESSING

The personal data provided (personal identification data such as, for example: name and surname, company name, tax code and VAT number, address, telephone, fax, e-mail, bank and payment references) are collected and processed:

- a) to carry out relationship activities on the basis of pre-contractual and contractual agreements;
- b) for administrative, fiscal or internal accounting purposes related to the customer-supplier relationship and to fulfil the obligations generally imposed on the Data Controller by laws or regulations, by community legislation, by requests of the judicial authorities or to exercise the rights of the Controller himself (for example the right of defence in court);
- c) for the following purposes: updates and institutional communications on the Data Controller's activities;

The legal ground that legitimizes the processing of data referred to in points "a" (pre-contractual and contractual agreements) and "c" (information and institutional communications) is the performance of a contract to which the data subject is party and, for the purpose "b" (administrative, accounting or tax purposes) is the fulfilment of the legal obligations of the controller.

No special data will be processed in accordance with articles 9 and 10 of the GDPR. The concerned party may, however, provide such data, where necessary, with a prior written consent sent to the Controller.

2. PROCESSING MODALITIES

The processing of personal data is carried out through the operations indicated in art. 4 of EU Regulation 679/2016 and precisely: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. The processing of data for the above-mentioned purposes takes place both automatically, on electronic media, and non-automatically, on paper, in compliance with the rules of confidentiality and security provided by law, by regulations and national provisions.

Personal data will also be processed with automated tools for the time strictly necessary to achieve the purposes for which they were collected.

The Data Controller implements appropriate measures to ensure that personal data are processed in an adequate manner and in accordance with the aims to be pursued and takes appropriate security, organizational, technical and physical measures to protect the information from alteration, loss, theft or improper or unlawful use.

3. THE NATURE OF THE PROVISION OF DATA

The provision of personal data relating to the processing is optional. However, the failure to provide, partial or total data may result in the partial or total impossibility of establishing or continuing the relationship, to the extent that such data are necessary for the execution of the latter.

4. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The data processing is carried out by the Controller's internal staff (employees, collaborators, System Administrators) identified and duly authorized to process the data in compliance to the regulations in force regarding privacy and data security, pursuant to art. 4, par. 1 n. 10 and art. 29 of the GDPR.

If necessary, personal data may be processed by individuals and / or companies appointed as Data Processors (pursuant to art. 28 of GDPR) upon which the Data Controller relies for the performance of certain services including, for example, technical consultants, professionals, web-marketing companies. The data may also be communicated by the Data Controller, on the basis of its legitimate interest, to companies with which it maintains relationships for the conduct and performance of extraordinary transactions such as, for example, the sale of business branches, mergers and acquisitions.

ASSARMATORI
SHIPOWNERS ASSOCIATION

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The updated list of Data Processors is kept at the registered office of the Data Controller. In any case, personal data are not subject to disclosure.

5. TRANSFER OF DATA TO A THIRD COUNTRY OR INTERNATIONAL ORGANISATIONS

As part of the management of the contractual relationship, no transfer of data to non-EU third countries or international organisations is envisaged.

6. RETENTION PERIOD OF PERSONAL DATA OR CRITERIA USED TO DETERMINE SUCH PERIOD

For the purposes referred to in Article 1, letters "a" (contractual and pre-contractual agreements), "b" (management of administrative, accounting and fiscal obligations) and "c" (institutional information and communications), personal data will be processed and stored by the Controller for the entire duration of the contractual relationship and, at the end of the latter, and for whatever reason, will be stored for 10 years after the termination of the relationship with the person concerned in accordance with the time provided by the current accounting, fiscal, civil and procedural regulations.

7. RIGHTS OF THE DATA SUBJECT

As the Data Subject and in relation to the processing described in this Policy, the User has the rights set out in Articles 7, 15 to 21, and 77 of GDPR and, in particular:

a) pursuant to art. 15 of the above mentioned Regulation "... *The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:*

- *the purposes of the processing;*
- *the categories of personal data concerned;*
- *the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if they are recipients from countries - third parties or international organisations;*
- *where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period.*

b) pursuant to art. 16 of the Regulation "... *The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement [...]*";

c) The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay, if one of the reasons provided for by art. 17 of EU Reg. 679/2016 exists;

d) The data subject shall have the right to obtain from the controller restriction of processing when one of the cases provided for by art. 18 paragraph 1,2,3 of EU Regulation 679/2016 occurs;

e) The data subject has the right to request the data controller to transfer his/her data to another data controller pursuant to art. 20 of EU Regulation 679/2016.

f) The data subject has the right to object at any time, for reasons related to his particular situation, the processing of personal data concerning him in accordance with Article 6, paragraph 1, letters e) and f) including profiling on the basis of these provisions, as provided for by art. 21 of EU Regulation 679/2016;

If the data subject considers that the processing activities infringe the provisions of the GDPR, the data subject has the right to lodge a complaint with a supervisory authority, in particular in the Member State where he or she normally resides, works or the place where the alleged infringement occurred. In Italy the competent authority is the Autorità Garante per la Protezione dei Dati Personali.

8. DETAILED RULES FOR THE EXERCISE OF RIGHTS

The data subject may at any time exercise its right by sending a PEC to: assarmatori@pec.assarmatori.eu

9 DATA CONTROLLER

The data controller, to whom the data subject may refer to is Assarmatori (hereinabove and below also "**Data Controller**"), and the details that allow you to quickly contact the Data Controller and to communicate directly and efficiently with the latter are:

1. desk phone: **06 32 01 244**
2. e-mail address: segreteria@assarmatori.eu
3. PEC address: assarmatori@pec.assarmatori.eu

The Data Controller has not appointed a Data Protection Officer.

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