

Privacy Policy on the processing of data under art. 13 of EU Reg. 2016/679

Marpol F.R. S.R.L., in its capacity as Data Controller, informs its Customers, pursuant to art. 13 of EU Reg. 2016/679, that the personal data communicated for the establishment and management of the contractual relationship concerning the Customer - if it is a natural person, firm or freelance, and/or natural persons (employees, collaborators) working on behalf of the Customer - will be processed in accordance with the principles of fairness, lawfulness, transparency and protection of confidentiality, in full compliance with current legislation on the protection of personal data.

1. Data Controller

The Data Controller is Marpol F.R. S.R.L. in the person of its legal representative *pro tempore*, with registered office in Sasso Marconi (BO) - 40037, Via San Lorenzo 7, VAT no. 02109531208.

2. Purposes of data processing, legal basis and provision of data

The processing of data by the Data Controller is aimed at allowing:

i) the execution of the contract entered into between the parties (or the execution of pre-contractual measures). Such data processing, pursuant to art. 6, par. 1, lett. b) of EU Reg. 2016/679, does NOT require the consent of the data subject. The provision of personal data by the Customer is required to initiate the contractual relationship; therefore, failure to provide complete and correct personal data could generate, as a consequence, the non-execution of the contract.

ii) fulfilment of accounting and tax obligations. Such data processing, pursuant to art. 6, par. 1, lett. c) of EU Reg. 2016/679, does NOT require the consent of the data subject. The provision of personal data by the Customer is required to fulfil accounting and tax obligations; therefore, failure to provide complete and correct personal data could generate, as a consequence, the non-execution of the contract.

iii) direct marketing purposes consisting in sending, through traditional contact channels - such as email/SMS/instant messaging, communications with promotional content and/or newsletters relating to the activities and services offered by Marpol F.R. S.R.L. This processing is carried out to respond to a legitimate interest of the Data Controller by virtue of the provisions of article 6, par. 1, lett. F) of EU Reg. 2016/679. Therefore, the aforementioned processing does NOT require the consent of the data subject who, however, may object to the processing at any time by contacting the Data Controller.

3. Processing methods and retention period

The personal data provided by the Customer will also be processed via outsourced entities, IT systems or by means of paper media, for the purposes indicated in the previous paragraph 2), guaranteeing their security and confidentiality due to the adoption, by the Data Controller, of adequate technical and organisational measures pursuant to art. 32 of EU Reg. 2016/679.

The personal data acquired will be processed for the time necessary to achieve the purposes provided for in this policy. In particular, for the purposes referred to in letters i) and ii), the data relating to the Customer will be deleted after 10 years from the termination of the contractual relationship, or may be stored in an anonymous form for statistical purposes only. As for the purposes referred to in letter iii), the data will be processed by the data controller until the data subject objects/revokes their consent.

4. Communication to third parties

The Customer's personal data may be communicated to public, institutional or professional entities entitled by law to request their acquisition as well as, exclusively for the purposes provided for in paragraph 2), to third-party companies or professionals (in their capacity as Data Controllers or appointed as Data Processors pursuant to art. 28 of EU Reg. 2016/679) on which the Data Controller relies for the performance of its business activities such as , by way of example but not limited to, tax and accounting consultants, legal and industry consultants, auditing companies, software supply and service companies. Please note that the personal data provided by the Customer will not be disclosed or transmitted to third countries (Extra EU). The list of third parties is available upon express request sent to the Data Controller.

6. Data subjects' rights

In accordance with the provisions of art. 15 *et seq.* of EU Reg. 2016/679, the data subject may at any time exercise, in relation to the Data Controller, the following rights: **a) [right of access]** to access their personal data and obtain a copy thereof; **b) [right to rectification]** to obtain the rectification of their data, if they are inaccurate, or the integration of their data, if they are incomplete; **c) [right to erasure]** to obtain the erasure of their data in the cases provided for by art. 17 of EU Reg. 2016/679;

d) [right to restriction] to obtain the restriction of processing in the cases provided for by art. 18 of EU Reg. 2016/679; **e) [right to portability]** receive in a structured, commonly used and machine-readable format, the personal data concerning him/her and request their transmission, by Marpol F.R. S.R.L., to another Data Controller; **f) [right to object]** to object, at any time, for reasons related to his/her particular situation, to the processing of data concerning him/her carried out pursuant to art.6 paragraph 1 lett. e) and f) of EU Reg. 2016/679 as well as to object, at any time, to the processing of data carried out for direct marketing purposes; **g) [right to lodge a complaint]** to lodge a complaint with the Italian Data Protection Authority pursuant to art. 77 of EU Reg.2016/679.

In order to exercise your rights or to receive further information, you can send a registered letter with return receipt to Marpol F.R. S.R.L., with registered office at Via San Lorenzo 7, Sasso Marconi - Bologna (BO), Italy, or send an email to info@marpolfr.com.