

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) sending emails relating to products and/or services similar to those already used by the data subject (so-called "Soft Spam"). This data processing, carried out pursuant to art. 6, par. 1, lett. f) of EU Reg. 2016/679, does NOT require the consent of the data subject who, at any time, may request the interruption of this activity through the "opt out" procedure at the bottom of the emails or by contacting the Data Controller at the contact details indicated at the bottom of this policy.

iv) 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.. Such data processing, pursuant to art. 6, par. 1, lett. a) of EU Reg. 2016/679, requires the prior **consent** of the data subject. Consent to data processing for the described purposes is optional and revocable at any time by following the "opt out" procedure at the bottom of the emails or by contacting the Data Controller at the addresses indicated at the bottom of this policy.

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 letters iii) and iv), 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 data processing in the cases provided for in article 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, 40037 Sasso Marconi (BO) - Italy, or send an email to info@marpolfr.com.

__Sasso Marconi__(_BO__), _24/09/2021

I declare that I have read the privacy policy on the processing of data and

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my consent to the processing of my personal data for the purpose of receiving commercial communications sent by Marpol F.R. S.r.l. (paragraph 2) lett. iv) **DIRECT MARKETING**

DATE: _____

The Customer

COMPANY NAME: _____

(Stamp and signature)