

POLICY FOR THE PROCESSING OF PERSONAL DATA

PURSUANT TO the European Regulation GDPR n. 2016/679 and Legislative Decree 196/2003 "CODE FOR THE PROTECTION OF PERSONAL DATA"

Grandi Navi Veloci S.p.A., as **controller** of the processing of your personal data, hereby informs you of their use and your rights, so that you may express your consent, where requested, in an informed manner.

Your personal data (provided by yourself, by third parties or, within the limits of the law, obtained from public lists) may be processed for the following **reasons**:

1 – **legal** reasons: or rather, in order to comply with the obligations provided for by the law, by a regulation, by community rules as well as by dispositions issued by Authorities qualified to do so by the law or by competent Supervisory or Regulatory Bodies (in this case your consent is not necessary inasmuch as the processing of data is correlated to the respecting of said obligations/dispositions);

2 - **contractual** and, more generally, administrative-accounting reasons: or rather, in order to fulfil obligations deriving from contracts which you are party to or to fulfil, before the conclusion of the contract, your specific requests, also via remote methods of communication, including a dedicated call centre (in this case your consent is not required as the processing of data is necessary for the management of the relationship or the executions of the requests);

3 – **commercial** reasons: with your prior consent, in order to provide you with information (also via remote methods of communication such as, for example, postal correspondence, telephone calls, also using automatic calling systems, telefax, email, SMS or MMS messages or other forms of message) regarding products, services or initiatives promoted by Grandi Navi Veloci S.p.A. or third parties, to promote the same, to carry out market research and/or verify the quality of products or services offered to you (also via telephone calls or the sending of questionnaires), to optimise said offers (also via targeted and selected analysis).

Grandi Navi Veloci S.p.A. may process your **sensitive data** strictly as necessary for the carrying out of specific operations requested by yourself or for the management of a number of your relationships with Grandi Navi Veloci S.p.A. and in compliance with the authorisation from the Data Protection Authority.

The processing of your data takes place via manual or automated instruments, with **approaches** which are strictly linked to the purposes set out above (also via profiling or in comparison with other data) and, in any case, in such a way as to guarantee the security, protection and confidentiality of your data.

Within Grandi Navi Veloci S.p.A., personnel may become **aware** of your data, including those charged with, or responsible for, their processing, staff and collaborators in any role (for example, deployed staff and apprentices) and external collaborators connected to central and sales network services and offices as well as to internal and external structures which carry out technical, support and company monitoring services on behalf of Grandi Navi Veloci S.p.A.

For the fulfilment of the aforementioned purposes, Grandi Navi Veloci S.p.A. may **communicate** your data to certain subjects, also abroad, as well as those identified by law, in order for them to carry out the relative processing and communication.

The aforementioned subjects will use the data received as autonomous “controllers”, save for when they have been designated by Grandi Navi Veloci S.p.A. as “data processors” for the processing that directly regards them.

Furthermore, Grandi Navi Veloci S.p.A. hereby informs you that the personal data contained in the recording of some financial operations (for example, in the case of a bank transfer, data regarding the payer) may also be forwarded, exclusively for legal purposes regarding the fight against terrorism and its financing, to the public authorities of the Member States of the European Union as well as other countries, including the United States.

Grandi Navi Veloci S.p.A. **does not pass** your personal data **to third parties**: they may only be disclosed and processed by third parties on specific assignment by Grandi Navi Veloci S.p.A. and exclusively for the purposes specified in point 3.

You may exercise your **rights** pursuant to article 7 of Legislative Decree 196/2003 and the Regulation GDPR 679/2016. In particular, you may send a written request, together with a copy of a suitable and valid form of identification, to **Grandi Navi Veloci S.p.A. - Tutela della Privacy (Privacy Protection)**, Via Balleydier 7 – 16149 Genoa – GE, in order to receive information regarding your data, their origin and their use, obtain the update, rectification, or if necessary, integration of the same, as well as, if processed in violation to the law, their cancellation or restriction. You may also oppose the processing of data for legitimate reasons. Opposition is always possible and free of charge in the case of advertising purposes, commercial communications or market research.

Grandi Navi Veloci S.p.A.