



COLLECTION AND PROCESSING OF CUSTOMER DATA

DISCLOSURE REGARDING THE PROCESSING OF PERSONAL DATA

provided pursuant to arts. 13 and 14 of EU Regulation no. 2016/679

Dear Customer,

We would like to inform you that EU Regulation no. 2016/679 and Italian Legislative Decree no. 196 of 30/06/2003, also known as the "Personal Data Protection Code", provide for the protection of persons and other parties with regard to the processing of personal data. In particular Start Romagna S.p.A. is required to provide you with certain information regarding the use of your personal data.

The processing of the data will be based on the principles of lawfulness, fairness, and transparency and the protection of your confidentiality and rights.

DATA CONTROLLER

The "Data Controller" is Start Romagna S.p.A. with registered office at Viale C. A. Dalla Chiesa 38, Rimini.

DPO - Data Protection Officer

Start Romagna S.p.A. has appointed a Data Protection Officer (DPO) who can be contacted at the following e-mail address: dpo@startromagna.it

TYPE OF DATA

The personal data collected and processed by us are the following: identifying data (company name, headquarters, phone no., fax no., e-mail address, tax information, etc.) and data related to economic and business activities (estimates, bank details, solvency, accounting and tax information, etc.).

These data are provided directly by you or may be collected from independent third-party data controllers (business information companies or registries, lists or public databases for financial solvency data, etc.).

PURPOSES AND METHODS OF PROCESSING

PURPOSES OF PROCESSING: The data referred to in this disclosure are collected and processed for the following purposes: execution of contracts entered into with you and related commitments, fulfilment of legal obligations related to the contractual relationship, organisational and commercial management of the contract (e.g. contractors for the organisation of activities to be carried out on customers' premises), protection of contractual rights, internal statistical analyses, marketing activities by sending promotional and advertising materials relating to products or services similar to those covered by the existing business relationship, and information on solvency.

PROCESSING METHODS: processing is carried out not only on paper but also with electronic and automated means. The data requested will be adequate for the purposes set out above, processed in a manner that is relevant to those purposes, and limited to those purposes. Specific security measures are taken to prevent data loss, unlawful or incorrect use, and unauthorised access.

DATA ACCESSIBILITY

Within the Data Controller's organisation, your data can be accessed by the employees of the Administrative Department, the Registry and Secretariat, the Quality Department, and the IT Department. They are authorised to process the data and have been adequately trained.

The data are made accessible to external entities with which Start Romagna S.p.A. collaborates and which Start Romagna S.p.A. has appointed as "Data Processor" or with which it shares the role of Data Controller for the data processing necessary for providing the requested transport service, such as:

- Partner transport companies;
- Companies and law firms for the protection of contractual rights;
- Independent professionals for administrative and accounting obligations;
- Certification body.

RECIPIENTS OR CATEGORIES OF RECIPIENTS

In addition to communications made in fulfilment of legal and contractual obligations, all data collected and processed may be disclosed exclusively for the purposes specified above to the following third parties:

- Banks for the management of cash receipts and payments;
- Tax authorities and other companies or public bodies in fulfilment of regulatory obligations;
- Control and supervisory bodies

For the purpose of organisational and commercial management of the contract (e.g. contractors for the organisation of activities to be carried out on customers' premises), your data may

be disclosed to agents, representatives, business brokers working for us, contractor companies or self-employed workers, and client companies.

Personal data are not subject to disclosure.

RETENTION

All the aforesaid data shall be retained for the purposes set forth in this disclosure and for the amount of time strictly necessary to pursue the purposes for which they were collected or, in cases where this is provided for, within the mandatory time limits established by law.

In any case, the data shall not be retained for more than 10 years from the date of termination of the requested service.

FREEDOM TO PROVIDE DATA AND GIVE CONSENT, CONSEQUENCES OF A REFUSAL

Providing data and the processing thereof is mandatory with regard to the purposes relating to contractual and legal obligations. Furthermore, providing the data is mandatory for the performance of all our activities that are necessary for the fulfilment of contractual obligations. Any refusal to provide the data for such purposes may make it impossible for us to implement the contractual relationship and comply with legal obligations.

There is no automated decision-making process within the scope of this processing, including profiling as set out in article 22, paragraphs 1 and 4 of EU Regulation 2016/679.

RIGHTS OF THE DATA SUBJECT

You may contact the Data Controller in order to exercise your rights as provided for in Articles 15 to 22 of EU Regulation 2016/679 and which are set out below:

- the right to ask the data controller for access to your personal data (Art. 15);
- the right to ask the data controller to rectify your personal data (Art. 16);
- the right to ask the data controller for the erasure of your personal data (Art. 17);
- the right to ask the data controller to restrict the processing of your personal data (Art. 18);
- the right to data portability (Art. 20);
- the right to object to the processing of your personal data (Art. 21);
- the right in relation to automated decision-making processes (Art. 22).

You also have the right to lodge a complaint with a supervisory authority.

Rimini, 27 May 2020

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