



COLLECTION AND PROCESSING OF DATA RELATING TO COMPLAINTS, SUGGESTIONS, AND REQUESTS

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

START ROMAGNA S.P.A. collects and processes exclusively your identifying personal data (first name, surname, address, etc.). These data are provided directly by you.

PURPOSES AND METHODS OF PROCESSING

PURPOSES OF PROCESSING: The data referred to in this disclosure are collected and processed for the purpose of handling complaints, suggestions and requests; checking and

verifying any discrepancies that may have occurred during the provision of the service offered by START ROMAGNA S.P.A.; and preparing and sending the reply to the complaint received. The data collected may also be used for statistical analyses carried out in aggregate and anonymously (i.e. without the use of identifying data).

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 Quality Department, the Sales Offices in the province, the Reception Desk and the Secretariat, the IT Department, and Management. 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:

- Statutory administrative, supervisory, and management bodies;
- Certification body.

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, for suggestions and requests, the data shall not be retained for more than 2 years from the date of receipt of the request or suggestion. For complaints, the data will be retained for 3 years from the date the complaint was made.

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 (Italian Data Protection Authority).

Rimini, 27 May 2020

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