



PRIVACY POLICY

(pursuant to Articles 13 and 14 of EU Reg. 2016/679 "GDPR")

This information on data processing describes the processing of personal data entered or collected on the <http://www.trieste-marine-terminal.com/> website ("Site") and any other websites on which it is published.

DEFINITIONS

Aggregate data. Aggregate data means the information on groups or categories of users, which do not identify and cannot be reasonably used to identify an individual user.

Anonymous data. Anonymous data means the information which does not directly or indirectly identify and cannot be reasonably used to identify an individual user.

Application. Application means a programme or service managed by Trieste Marine Terminal SpA (or on behalf of Trieste Marine Terminal) that can be displayed on various environments and online platforms, mobile or otherwise, including those managed by third parties, which allow us to interact directly with our users.

Data subject. This is the natural person to whom the personal data refers, who is identified or identifiable, i.e. who can be identified even indirectly, by reference to characteristic information or elements, or by the crossing of several items of personal data.

Children. Children means the individuals identified by us as minors who are not able, according to the Law, to grant their consent to the collection and the processing of personal data.

Data Controller. The natural or legal person who determines the purposes and means for the processing of personal data. The data controller responsible for the personal information collected through the Sites, Applications or other channels identified above is Trieste Marine Terminal SpA with registered office in Molo VII - Punto Franco Nuovo, 34123 Trieste (TS).

Data Processor. The data processor is a natural or legal person who is in charge of the processing of personal data on behalf of one or more data controllers and who is only authorised to carry out the processing of data in accordance with the instructions of the data controller.

Data Protection Officer. The Data Protection Officer (DPO) is a role provided for in Article 37 of (EU) Regulation 2016/679. This is a person designated by the controller or processor to perform support and control, advisory, training and information functions in relation to the application of the Regulation. It cooperates with the Authority and is the point of contact, also in relation to data subjects, for matters related to the processing of personal data.

IP address. The IP address is associated with the access point through which the connection to the internet is made, and is usually controlled by the Internet Service Provider (ISP) of the user.

Notification. Notice may be given by email to the user at their last communicated e-mail address, by posting notices of changes on the Sites and Applications or by other means in accordance with applicable law.

Personal data. Personal data means information about a natural person that identifies (directly or indirectly) a specific individual, e.g. name, postal address, email address, telephone number, navigation data, IP address, features of his or her physical, physiological, genetic, mental, economic, cultural or social identity, choices and habits.

Public forums. The Site and Applications may offer message boards, conversation pages, chat rooms, social community environments, profile pages and other forums whose audience is not limited. If personal information is provided when using these features, that information may be made public or otherwise disclosed without restriction to our use or that of third parties. To request the deletion of personal data from the public forum on one of our Sites or Applications, please contact dpo@trieste-marine-terminal.com.

Site. The institutional website <http://www.trieste-marine-terminal.com/>



DATA COLLECTED

This site collects and processes Personal Data, as defined by the GDPR, independently or through third parties, or provided voluntarily by the user, including:

- Cookies and Usage Data, collected through automatic processes;
- Personal data (Email, Name, Surname, Company and Country)

When indicated by the character "*" the data requested by this site is mandatory. If the User refuses to disclose it, it may be impossible for the Controller to provide the Service or fulfil the request. In cases where this website indicates certain Data as optional, Users are free to refrain from disclosing it, without this having any consequence on the availability of the Service or its operation.

Users in doubt as to what Data is mandatory are encouraged to contact the Data Controller.

Any use of Cookies - or of other tracking tools - by this Site or by the owners of third party services used by this Application, unless otherwise specified, is for the purpose of providing the Service requested by the User, in addition to the further purposes described in this document and in the Cookie Policy, to which reference should be made.

PROCESSING METHODS

The Data Controller takes appropriate security measures to prevent unauthorised access, disclosure, modification or destruction of Personal Data. The processing is carried out using computer and/or digital tools, with organisational methods and logics strictly related to the purposes indicated. In addition to the Data Controller, in some cases, other internal subjects or external subjects (such as third party technical service providers, hosting providers, IT companies, communication agencies) appointed as Data Processors by the Data Controller may have access to the Data.

PURPOSE OF THE PROCESSING OF COLLECTED DATA AND STORAGE PERIOD

The User Data is collected for the following purposes:

- a) to guarantee registration on the Site, allow the user to access some web pages of the Site where it is possible to use specific online services, guarantee the correct provision of the services requested through the Sites, Applications or other channels, and, therefore, correctly and punctually fulfil all the obligations deriving from the contractual relationship established. This includes the management of the newsletter deriving from a free registration of the User on the dedicated form. The data will be stored for 10 years from the date when the contractual relationship ceases.
- b) to comply with legal and regulatory provisions, including tax provisions, or to comply with an order from judicial or police authorities or supervisory bodies. The data will be stored for 10 years from the date when it was collected;
- c) Lastly, the primary purposes include also certain technical processing carried out employing the so-called "technical cookies" based on what is detailed in the Cookie Policy. In these specific cases, technical processing is intended solely for the purpose of carrying out the transmission of a communication over an electronic communications network to the extent strictly necessary for providing the services explicitly requested by users. The data will be used for the amount of time strictly necessary for managing the functions for which those cookies were designed.

In all the cases described above in points a), b), c), the Data Controller is not obliged to obtain the specific consent of the data subject. In fact, all the processing operations described above pursue primary purposes for which current legislation excludes the need to obtain the specific consent of the data subject, either because the processing is necessary to fulfil an obligation imposed by law, regulation or Community legislation, or because the processing is necessary to perform obligations arising from a contract to which the data subject is party, or to fulfil, prior to the conclusion of the contract, specific requests of the data subject, or to pursue the legitimate interests of the data controller, also taking into account the reasonable expectations of the data subjects.



If the user does not intend to provide the personal data required and necessary on the basis of the foregoing, the consequence would be the impossibility of registering on the Site and of using all the services for which registration and the provision of data are in any case technically and contractually necessary. It would still be possible to browse the Site as a non-registered and anonymous user and view only the content and materials available without registration.

LOCATION OF THE DATA PROCESSING

The data collected from the site is processed by the Data Controller located in Molo VII - Punto Franco Nuovo, 34123 Trieste (TS), and is handled only by technical personnel who are authorised to process it, or appointed as external data processors pursuant to Article 28 EU Reg. 2016/679.

This site may share some of the data collected with services located outside the European Union area, always in compliance with the rights and guarantees provided for by current legislation, pursuant to Articles 44 et seq. of EU Reg. 2016/679.

CATEGORIES OF RECIPIENTS, COMMUNICATION AND DISSEMINATION OF DATA

For the purposes indicated above, the data collected may be made accessible or disclosed to:

- employees of the Data Controller, in their capacity as authorised processing personnel (or so-called "Data Processors"), within the scope of their respective duties and in accordance with the instructions received. Said individuals are, nonetheless, subject to the obligations of secrecy and confidentiality;
- third parties who carry out *outsourced* activities on behalf of Trieste Marine Terminal SpA as trusted external parties to whom the Data Controller entrusts certain activities, or part of them, functional to the provision and distribution of the services offered through the Site. In such cases, these parties will be appointed as Data Processors pursuant to Article 28 GDPR. The complete list of Data Processors is available upon request to Trieste Marine Terminal SpA through the contact channels indicated in this document;
- any entity (including Public Authorities) which may access the personal data by virtue of statutory and administrative provisions;
- any public and/or private subject, individuals and/or entities (legal, administrative and tax consultancy firms, Judicial Authorities, Chamber of Commerce, Labour Authorities, etc.), if disclosure is required or functional for the correct performance of the contractual obligations, and also of the statutory obligations;
- banks and companies that manage National and International payment circuits through which the online payments of the products purchased through the Website are carried out.

We do not collect personal data to resell or transfer it to third parties for marketing purposes. In any case, personal data will not be disseminated.

POSSIBLE DISCLOSURE BY THE DATA SUBJECT OF THIRD-PARTY DATA

Users acknowledge that any disclosure of personal and contact data of any third party other than the data subjects themselves represents a processing of personal data for which they are the independent data controllers, assuming all the obligations and responsibilities provided for by current legislation on personal data.

On this point, users grant the broadest indemnity with respect to any dispute, claim, request for compensation for damages from processing or other that may be received by Trieste Marine Terminal SpA



from any third party due to the provision of data disclosed by the user in violation of the rules on the protection of applicable data.

INTERNATIONAL TRANSFER, STORAGE AND PROCESSING OF PERSONAL DATA

The management and storage of personal data will take place on servers located within the European Union. It is possible that Trieste Marine Terminal SpA stores personal data in a cloud, this means that data may be processed by cloud service providers on behalf of Trieste Marine Terminal SpA, in any case cloud service providers will be required to store data on servers located in the European Union.

Where our business involves the transfer of personal data to third parties located in different locations around the world for the purposes described in this privacy policy, wherever personal data is transferred, stored or processed by us, we will take appropriate organisational and contractual measures to safeguard personal data and impose similar, but no less restrictive, requirements on cloud service providers, including an obligation to process personal data only for the purposes set out above.

PRIVACY RIGHTS OF CHILDREN

With regards to the functions of the Site, we do not intentionally collect personal data from Children. In accordance with applicable law, the Parent must provide consent to the collection of the Child's personal data; the Child's registration on the Site must therefore be authorised by the Parent and carried out under the Parent's supervision, which is why the email address provided must be that of the Parent. The parent has the right to review and request the removal of the Child's personal data.

SECURITY MEASURES

This site processes user data in a lawful and proper manner, adopting appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the data. The processing is carried out using computer and/or digital tools, with organisational methods and logics strictly related to the purposes indicated. In addition to the Controller, in some cases, categories of managers involved in site organisation or external parties (such as third-party technical service providers, hosting providers, IT companies, communication agencies) may have access to the data.

USER RIGHTS

With regard to the personal data itself, data subjects may exercise the rights provided for in Articles 15 et seq. GDPR, precisely:

Right of access (Article 15) - consists of obtaining confirmation from the Data Controller as to whether or not personal data relating to them is being processed and, if so, to obtain access to such data and to certain information (set out in the aforementioned Article) concerning such data. **Right of rectification** (Article 16) - consists of giving data subjects the possibility to modify their data if it is inaccurate. **Right of erasure** (Article 17) - Possibility for the data subjects to erase their data in the Controller's possession when, for example, the consent to the processing has been revoked, when the pursued purpose has been reached, or when it is illegal. Obviously, it will not always be possible to comply with the deletion request. This is the case, for example, when the data are needed to fulfil a legal obligation or are required for the defence of a legal claim. **Right to object** (Article 21) - Possibility of objecting to the processing must be guaranteed when the legal basis is the legitimate interest or the execution of a task of public interest. This right also has its limits in that there may be cases where the legitimate interest of the Data Controller prevails over that of the data subjects, and it is essential to strike the right balance, or the processing is necessary for a task carried out in the public interest or for the establishment, defence or exercise of a right before a judge. **Right to portability** (Article 20) - provides that, where a processing operation is based on contract or



consent, upon request, the data subjects shall be provided with their personal data in a structured and machine-readable format (json, xml, csv); this right only applies to data provided spontaneously and not to data inferred or derived.

Right of withdrawal (Article 7) - In case of signing any form of consent to the processing requested by the Data Controller, it should be noted that data subjects can revoke it at any time, without prejudice to the mandatory obligations provided for by the legislation in force at the time of the request for withdrawal, by contacting the Data Controller at the address given above, or by email, specifying the subject of your request, the right you intend to exercise and attaching a photocopy of an identity document certifying the legitimacy of the request .

The data subjects shall have the right to lodge a complaint with the competent supervisory authority in the Member State where they normally reside or work, or in the State where the alleged infringement has occurred.

All the aforementioned rights may be exercised by sending a specific request to the Data Controller through the contact channels shown in this privacy policy.

DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data Controller is TRIESTE MARINE TERMINAL SpA with registered office in Molo VII - Punto Franco Nuovo, 34123 Trieste (TS), who you can contact by writing to the following email address: dpo@trieste-marine-terminal.com, or by calling 040.3186444.

The Data Protection Officer pursuant to Articles 37 et seq. GDPR is identified as the company PRATIKA S.R.L. (contact person Alex Stellini) located in Via Carnia 1, Rodeano Alto, Rive D'Arcano (UD), whose contact details are: email dpo@gruppopk.com; PEC [certified email address]: info@pec.pratikasrl.com