

|   |  | PRIVACY POLICY REGARDING PERSONAL DATA<br>EX ARTT 13 AND 14 REG. EU 2016/679 (GDPF   |   |  |
|---|--|--|---|--|
|   |  | DATA CONTROLLER  | <i>y</i>  |  |
| Name  | Vado Gateway S.p.a.  |  |   |  |
| C.F. or P.IV.   | 06259850961  |  |   |  |
| Headquarters  | Via Aurelia 75B Vado Ligure (SV), 17047  |  |   |  |
| Email   | bssupportservices@apmterminals.com   |  |   |  |
| CATEGORY OF DATA PROCESSED  |  |  |   |  |
| Common data   | Personal data (name and surname); institution/employer to which the interested party belongs.  |  |   |  |
| Particular Data   | N/A  |  |   |  |
| PURPOSE   |  | LEGAL BASIS  | DATA RETENTION  |  |
| Compliance with the legal obligations relating to safety at work.   |  | Fulfilment of a legal obligation ex art. 6 co. 1 lett. c)  | Data will be retained for 6 months from the day of access |  |
|   |  | Your refusal to provide information may result in the impossibility of giving access to the offices and operating areas of the Data Controller |   |  |
| Protection of the rights and property                               |  | Pursuit of the legitimate interest of the Data   | For the entire duration of the legal                      |  |
| of the Data Controller, including legal                             |  | Controller (art. 6 co. 1 lit. f)   | proceedings undertaken and any time                       |  |
| proceedings   |  |  | provided for the protection of the rights of              |  |
|   |  |  | the Data Controller                                       |  |
| PROVISION OF THE DATA   |  |  |   |  |
| The provision of personal data of the interested party is mandatory |  |  |   |  |
| COMMUNICATION OF DATA   |  |  |   |  |
| AUTHORIZED  | The data will be processed exclusively by authorised parties instructed by the Data Controller for the management of compliance with health and safety at work (including the Supervisory Body, RSPP, HR Office, Legal Office, Board of Directors).  |  |   |  |
| DATA PROCESSORS   | The data may be communicated to Subjects entrusted with the activities of supervision and control, legal advice, health services companies, archiving or other technical/organizational services. The above mentioned entities operating on behalf of the Data Controller have been designated as Data Processors. |  |   |  |
| AUTONOMOUS DATA   |  |  |   |  |
| CONTROLLERS   | Judicial Authority, Labor Physician, Trade Union Associations, Public Bodies in matters of employment,   |  |   |  |
|   | welfare, assist  | welfare, assistance, tax, accounting, hygiene and safety etc.)   |   |  |
| DATA TRANSFER   |  |  |   |  |
| Personal data will not be legislation                               | oe subject to diss   | emination but may be transferred abroad, includi   | ng in countries outside the EEA, according to             |  |
|   |  |  |   |  |

## AUTOMATED PROCESS

Data will not be subject to fully automated decision-making

## **RIGHTS OF DATA SUBJECTS**

The privacy legislation (artt. 15-23 Reg. EU 2016/679) guarantees the Data Subject, except in the case where such fulfillment proves impossible or involves the use of means manifestly disproportionate to the protected right, the right to

- access, updating, rectification or integration of data, deletion, anonymisation or blocking of data processed in violation of the law,
- know the details of the Data Processors appointed and the subjects to whom they have been communicated,
- object for legitimate reasons to the processing of your data,
- obtain the indication of the origin of the data, the purposes and methods of processing, the logic applied in case of processing carried out with the aid of electronic tools.

The confirmation may take up to 30 days of processing.

Without prejudice to any other administrative or judicial remedy, the Data Subject has the right to lodge a complaint with the Supervisory Authority for cases of retention of the Company's breach of the provisions of EU Regulation 2016/679.

Classification: Internal



In order to exercise your rights and/or for all questions related to the processing of your data, the Interested Party may send a communication:

- > By email to bssupportservices@apmterminals.com
- > By register letter to Vado Gateway S.p.a., Via Aurelia 75B Vado Ligure (SV) 17047

Classification: Internal