

## PRIVACY POLICY

The user's personal data are processed by Manto Shipping & Consulting s.r.l., which is the data controller, in compliance with the principles of personal data protection established by GDPR Regulation 2016/679 and the current national legislation..

### SOURCE OF PERSONAL DATA

The collection of personal data is carried out by Manto Shipping & Consulting s.r.l. by recording the data:

- collected directly from the interested party at the time of initial contact or subsequent communications
- provided by third parties

### METHODS AND PURPOSES OF DATA PROCESSING

1. We inform you that the data will be processed using the following means:

- Personal computers
- Mixed – electronic and paper

With the following purposes:

- Compliance with legal obligations related to commercial relationships
- Compliance with tax or accounting obligations
- All-risk insurance
- Consultancy activities
- Pre/post-sales support contacts
- Insurance coverage

### LEGAL BASIS

2. The legal bases for processing common data, according to Art. 6 of the GDPR Regulation, are:

- Contract;
- Processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;

The legal bases for processing special categories of personal data, according to Art. 9 of the GDPR Regulation, are:

- Contract;
- Processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;

### CATEGORIES OF RECIPIENTS

3. Without prejudice to communications made in compliance with legal and contractual obligations, all collected and processed data may be communicated exclusively for the above-mentioned purposes to the following categories of recipients:

- Intermediary agencies;
- Supervisory and control authorities;
- Public economic entities;
- Public non-economic entities;
- Data subjects;
- Companies that provide warehouse and transport logistics services;
- Companies and enterprises;

In managing your data, the following categories of authorized and/or responsible internal and external persons identified in writing and to whom specific written instructions have been provided regarding the processing of data may also become aware of them:

- Santoro Claudio, tax code SNTCLD80L14G273C - Administrative; Customs Department
- Conoscenti Germana, tax code CNSGMN82B59G273J - Administrative; Operational Department
- Gambino Silvia, tax code GMBSLV82T66G273V - Administrative; Operational Department
- Pillitteri Maurizio, tax code PLLMRZ94R17G273J - Administrative; Operational Department
- Di Cara Rachele, tax code DCRRHL91E65G273H - Administrative; Operational Department
- Misuraca Giuseppa, tax code MSRGPP77S56G273T - Administrative; Operational Department
- Manto Danilo, tax code MNTDNL74S29G273E - Legal representative
- Anselmo Daniele, tax code NSLDNL81P14G273E - Administrative; Customs Department
- Giammanco Manlio, tax code GMMMNL81P27G273Z – Administrative; Customs Department
- Gambino Silvia, tax code GMBSLV82T66G273V - Administrative; Operational Department
- Leotta Daniela, tax code LTTDNL78C71G273D - Administrative; Operational Department

#### **PERSONAL DATA CATEGORIES**

4. According to Article 14 of the GDPR, since the data was not obtained from the data subject, the categories of personal data subject to processing are reported as follows:

- Customer personal details;
- Property, possessions, and assets (property, possessions, and leases; goods and services provided or obtained);
- Tax identification numbers and other personal identification numbers (health cards);

#### **DATA RETENTION PERIOD**

5. The data retention period is:

- Transport: The data concerning you will be processed/retained according to the following criteria: - for a period not exceeding that necessary to achieve the purposes for which they are processed; - for a period not exceeding that necessary to comply with legal obligations.
- Customs Operational Department: The received data will be used exclusively for the provision of the requested service and for the time necessary to provide the service.
- Warehousing Storing and Logistics: The received data will be used exclusively for the provision of the requested service and for the time necessary to provide the service.
- Sale of used containers: The received data will be used exclusively for the provision of the requested service and for the time necessary to provide the service.
- Precious shipments: The received data will be used exclusively for the provision of the requested service and for the time necessary to provide the service.
- All-Risk insurance: The data concerning you will be processed/retained according to the following criteria: - for a period not exceeding that necessary to achieve the purposes for which they are processed; - for a period not exceeding that necessary to comply with legal obligations.

#### **DATA SUBJECT RIGHTS**

6. Pursuant to European Regulation 679/2016 (GDPR) and current national legislation, the data subject can exercise the following rights, within the limits and according to the procedures provided by the current legislation:

- to obtain confirmation of the existence of personal data concerning them (right of access of the data subject - Article 15 of Regulation 679/2016);
- to know its origin;
- to receive intelligible communication;
- to have information about the logic, methods, and purposes of the processing;
- to request updating, rectification, integration, erasure, anonymization, or blocking of data processed in violation of the law, including data that is no longer necessary for the purposes for which it was collected (right to rectification and erasure - Articles 16 and 17 of Regulation 679/2016);
- the right to restrict and/or object to the processing of data concerning them (Articles 18 and 21 of Regulation 679/2016);
- the right to revoke consent;
- the right to data portability (Article 20 of Regulation 679/2016);
- in cases of processing based on consent, to receive their data provided to the data controller, in a structured, commonly used, and machine-readable format and to transmit this data to another data controller without hindrance;
- the right to lodge a complaint with the supervisory authority (right of access of the data subject - Article 15 of Regulation 679/2016).

7. The data controller for your personal data is Manto Shipping & Consulting s.r.l., VAT number 05313210824, tax code 05313210824.

- Email: [daniло.manto@mantoshipping.com](mailto:daniло.manto@mantoshipping.com)
- PEC: [mantoshipping@pec.it](mailto:mantoshipping@pec.it)
- Telephone: +39 0917495228

8. The undersigned Company has appointed the following individuals as DPO (Data Protection Officer):

- Sottile Francesco, tax code STTFNC82B17D423C, who can be contacted at the following email address: [f.sco-sottile@libero.it](mailto:f.sco-sottile@libero.it).