



ADAM SHIPPING AND CHARTERING S.r.l.



Via Mattiauda, 9/7
17100 SAVONA
tel. 019.853816 / 019.853892
fax 019.806281
e-mail: info@adamshipping.it
pec: direzione@pec.adamshipping.it

POLICY PURSUANT TO SECTION 13 OF (EU) REGULATION NO. 2016/679 ("GENERAL DATA PROTECTION REGULATION")

Pursuant to the provisions of Italian and European laws on data protection (EU Regulation No. 2016/679), the processing of any information concerning the users of the services provided by ADAM SHIPPING AND CHARTERING S.R.L., shall be based on fairness, lawfulness and transparency principles, while protecting the confidentiality and rights of the users.

1. DATA CONTROLLER

The Data Controller for our services is ADAM SHIPPING AND CHARTERING S.R.L., VAT No. 00930970090, with registered office in via UBERTO VISCONTI DI MODRONE N 11 - 20122 MILAN.

The Data Controller shall protect the secrecy of any personal data and ensure any required protection thereof from any event which may affect them.

The Data Controller shall apply, for such purposes, any policies and practices concerning collection and use of any personal data as well as the exercise of the rights entrusted to it by any applicable laws and regulations.

The Data Controller shall procure that any policies and practices adopted to ensure the protection of any personal data are updated any time this may be required and, anyway, in case of amendment of any applicable laws and regulations or of any organization rules which may affect their data processing activities.

2. PURPOSES AND LEGAL BASIS OF PROCESSING

The Data Controller shall collect and/or receive any information concerning the Data Subject, including, but not limited to: his/her first name, surname, taxpayer code or VAT number, place and date of birth, physical and electronic addresses, electronic invoice code, telephone number and/or mobile number. Such data shall be used to pursue the management of the agreement concerning any requested services as well as the performance of any obligations set forth by any applicable laws and/or regulations and to be complied with by the Data Controller due to its office.

ADAM SHIPPING AND CHARTERING S.R.L. shall process any personal data and information collected for the following, specific purposes, including, but not limited to:

- The management of the contractual relationship;
- The entering into of the service provision agreement and the fulfilment of the pre-contractual, contractual, accounting-administrative and tax obligations, arising from their existing relationship;
- The management of any disputes (including, but not limited to: breach of contract, settlement, receivable collection, arbitrations, legal proceedings, etc.).

The personal data requested by ADAM SHIPPING AND CHARTERING S.R.L. shall be provided in order to pursue the above indicated purposes. In case of denial to provide the data required for the purposes indicated above, we could not be able to fulfil the requests submitted by the Data Subject involved, or provide other available services or also properly fulfil any contractual (or pre-contractual) obligations or any duties set forth by the applicable laws and regulations.

Sede legale: Via U. Visconti di Modrone, 11 - 20122 MILANO (MI) - Capitale Sociale € 15.600,00 int. vers.
Registro Imprese di Milano: 00930970090 - C.F. e P.I. IT 00930970090



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for the purpose of fulfilling their own legal or contractual obligations or to provide any requested services, shall be optional and shall not affect the use of any services.

As applicable and, if required, from time to time, the users shall be informed whether they have the obligation or the option to provide their personal data.

3. LEGAL BASIS OF PROCESSING

ADAM SHIPPING AND CHARTERING S.R.L. shall lawfully process the personal data provided to it, should the processing be required:

- To perform its contract or an agreement with the Data Subject, or to perform any requested pre-contractual measures;
- To perform a legal obligation of the Data Controller.

4. PERSONAL DATA PROCESSING

The personal data provided shall be:

- Processed by ADAM SHIPPING AND CHARTERING S.R.L. employees, properly entrusted to manage any fulfilments required to perform any requested services;
- Communicated to the public administration agencies (e.g., Regional and Municipal entities), tax agencies, the Tax Squad, the Port Authority, the Financial Police, the Health Department, the Regulatory Authorities and, in general, any bodies in charge of performing any assessments and controls concerning the proper fulfilment for the purposes indicated above;
- Communicated to third companies or persons operating in the name and on behalf of ADAM SHIPPING AND CHARTERING S.R.L.

The names of those operating in the name and on behalf of ADAM SHIPPING AND CHARTERING SRL may be requested in any time to the Administration Department, provided that no personal data shall be divulged.

5. TRANSFER OF DATA

The management and storage of any personal data shall be made in certain servers located within the European Union. The servers we currently use are located in Italy. The data shall not be transferred outside the European Union.

6. PROCESSING MODALITIES

The users' personal data shall be processed through either automated and non-automated means, ensuring adequate safety and organization measures, as well as the confidentiality thereof.

7. DATA STORAGE PERIOD

Any collected data shall be stored for the whole duration of any requested services and, even after the termination thereof, to ensure the fulfilment of any and all requirements of law related thereto, or arising therefrom.



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Therefore, any criteria used to determine the storage period are established by:

- Specific provisions of law, regulating the activities of ADAM SHIPPING AND CHARTERING S.R.L.;
- Any tax laws with regard to the processing of accounting-administrative data (10 years); in particular, with regard to any financial data (e.g., payments, reimbursement, etc.), the storage period set forth by the applicable tax and accounting laws shall apply.

The personal data shall be stored, eventually, also for the time allowed by the Italian law to protect any legitimate interest of ADAM SHIPPING AND CHARTERING S.R.L. (section 2947, 1 and 3 paragraphs, of the Italian Civil Code).

8. DATA SUBJECT INTERESTS: ACCESS, RECTIFICATION, AND ERASURE OF THE PERSONAL INFORMATION

The Client shall have the rights provided by any newly enacted EU laws on personal data processing, and, more specifically:

- a) To get confirmation that his/her personal data are processed and, in such case, to access such data as well as any and all information concerning such processing;
- b) To obtain the rectification of any inaccurate personal data without any undue delay, and to complete any uncomplete data, including by means of providing a supplementary statement;
- c) To obtain the erasure of his/her personal data, in case:
 - Such personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed,
 - Such personal data are unlawfully processed,
 - Such personal data have to be erased for compliance with a legal obligation,
 - He/she has revoked his/her consent,
 - He/she objects to processing;
- d) To obtain the restriction of processing, should any of the following cases occur:
 - The accuracy of the personal data is contested by the Data Subject, for a period enabling SHIPPING AND CHARTERING S.R.L. to verify the accuracy of the personal data;
 - The processing is unlawful and the Data Subject objects to the erasure his/her personal data and requests the restriction of their use instead;
 - ADAM SHIPPING AND CHARTERING S.R.L. no longer needs such personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of any legal claims;
 - The Data Subject has objected to processing pending the verification whether the legitimate grounds of ADAM SHIPPING AND CHARTERING S.R.L. override those of the Data Subject;
- e) To receive the personal data concerning him/her, in a structured, commonly used and machine-readable format and to transmit those data to another data controller, without any hindrance from ADAMSHIPPING AND CHARTERING S.R.L.;
- f) To object, in whole or in part, to the processing; where such personal data are processed for scientific or historical research purposes or statistical purposes, the Data Subject, on grounds relating to his/her particular situation, shall have the right to object to processing of the personal data concerning him/her, unless the processing is necessary for the performance of a task carried out for reasons of public interest;



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g) To withdraw, in any time, the consent provided by him/her (in such case, such withdrawal shall not affect the lawfulness of the processing based on consent before withdrawal);

h) To lodge a complaint with the Italian Data Protection Authority (for more details on the relevant modalities, please visit the website: www.garanteprivacy.it).

The above mentioned rights shall be exercised by filing a request to ADAM SHIPPING AND CHARTERINGS.R.L. as follows:

- via e-mail to the following e-mail address: info@adamshipping.it
- via certified e-mail to the following address: direzione@pec.adamshipping.it
- via registered letter with receipt of return to the following address "ADAM SHIPPING AND CHARTERING S.R.L. – Administrative Offices - VIA MATTIAUDA 9/7 SAVONA

9. AMENDMENTS AND UPDATES OF THIS PRIVACY POLICY

ADAM SHIPPING AND CHARTERING S.R.L. shall amend or simply update, in whole or in part, this data processing policy, also in light of any amendment of the provisions of the laws and regulations regulating this matter and protecting the rights of the users of the services.