

Privacy Notice

Pursuant to art. 13 of EU Regulation 679/2016 (GDPR)

Last revision: 22/08/2019

This privacy notice has the purpose of describing the treatment of personal data effected by Samer Seaports & Terminals S.r.l. in the context of their company activity and this Internet website.

1. Data Controller

Samer Seaports & Terminals S.r.l., with registered office at Porto Franco Nuovo-Riva Traiana Trieste 34123 (TS).

Telephone: +39 040 982841

Fax: +39 040 3229161

E-mail: privacy.trieste@dfds.com

2. Type of data treated

- a) Automatic navigation data: the Internet website of Samer Seaports & Terminals uses some cookies to collect data on user's connecting. This data is acquired automatically during navigation and are, for example, *Internet Protocol* (IP), domain names of computers used to visit the site, *Uniform Resource Identifier* (URI) of resources requested, various details of requests sent to the site server, general geographical position as indicated by IP, device used to connect to the site and other parameters regarding user operative and IT system, transmission of which is intrinsic to the regular and correct Internet and website operation. This information is not collected to be associated to identified subjects but could, by their own nature and through elaboration and association with data held by third parties, allow for identification. For more information on the cookies used by the website, please consult our **Cookie Policy**.

- b) Data supplied by the user: Samer Seaports & Terminals can collect user data in the context of requests for information, stipulation of contracts, fulfilment of orders, terminal access requests, sending of hard copy or e-mail correspondence to the references available on the website or elsewhere, fairs and/or events, sending/delivery of *curriculum vitae*, such as names, surnames, telephone numbers, addresses, e-mail, bank coordinates, identification of legal representatives or company representatives, tax codes, information on identification documents or any other information voluntarily sent by the user to the company.

3. Purposes and juridical basis for treatment

Punto Franco Nuovo Riva Traiana, 34123 Trieste
Tel 040/982841 Fax 040/3229161
PEC: samerseaports@legalmail.it
Società a responsabilità limitata
Capitale sociale Euro 2.800.000,00 i.v.
Codice fiscale 00752330324
Partita IVA IT 00752330324
Iscrizione al Registro Imprese della Venezia Giulia 00752330324

Società soggetta ad attività di
controllo e coordinamento ai sensi
dell'art. 2497 bis cod. civ. da parte della
DFDS Denizcilik ve Taşımacılık A.Ş.

Personal data is treated by the company in virtue of the following juridical basis and purposes:

PURPOSE	ADDITIONAL INFORMATION	JURIDICAL BASIS
1. To implement and improve website services, analyze user interaction with the site and prevent cybercrimes.	Data on navigation can be used by the company to guarantee regular and correct functioning of the site, to implement and improve navigation, to evaluate manners in which users interact with the site and, where needed, to ascertain and pursue any illegitimate acts performed to the detriment of the site and/or its users.	Legitimate interest of Samer Seaports & Terminals in the correct functioning of the site. Consent of the user, if needed, for treatment of data collected by cookies.
2. Satisfy requests for information and supply requested services.	In the context of supplying services of deposit, loading and unloading containers, Ro-Ro and transport by train, the company may treat information on identity and contacts of legal representatives and company representatives of the clientele, bank coordinates, tax codes, payments, to the purpose of supplying the services requested and fulfil related obligations, such as assistance and support, billing, administration of payments, customer care, account keeping, etc. The company can further acquire copies of identity documents of clients who must access the Trieste port areas and the terminal of Samer Seaports & Terminals in order to handle requests for authorization for access from the competent Port Authority System to which said data is transmitted.	Performance of contract to which the client is party and/or adopting pre-contract measures in the clients' interest.
3. Research and obtain the products and services needed for the company's activities	In the context of its business, the company uses suppliers of various types of products and services, in relation to which information can be collected, such as tax codes, names and surnames, addresses, contact details or other elements of personal identification needed to establish and/or execute	Performance of contract to which the client is party and/or adoption of pre-contract measures in the client's interests.

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	<p>commercial relationships.</p> <p>This data is used by the company to the sole purpose of implementing commercial relationships, effecting payments for products/services received, caring for relationships with suppliers, keeping of accounts, etc.</p> <p>The company may also acquire copies of identification documents of suppliers which must access areas of Trieste port and the terminal of Samer Seaports & Terminals, to handle request for access authorization from the competent Port System Authority to which the data is transmitted.</p>	
<p>4. Handling any incidents at the Terminal</p>	<p>In case of incidents in the terminal areas of Samer Seaports and Terminals, the company may collect and transmit personal information, even with particulars, to insurance companies holding insurance cover considered from time to time.</p> <p>The treatment of this data is finalized exclusively to the settlement of the event and possible indemnification of damages.</p>	<p>Legitimate interest of Samer Seaports & Terminals in indemnification of damages.</p> <p>Performance of a contract to which the damaged part is party.</p> <p>Consent of the client in case of collection and treatment of a particular category of data, such as data regarding health.</p>
<p>5. Evaluation of voluntary candidature received by the company or those requested directly by Samer Seaports & Terminals for positions open and possible hiring of personnel</p>	<p>The company uses the information contained in curricula, such as contact details, work experience, study titles, qualifications, etc. to evaluate candidatures transmitted in relation to occupation needs of Samer Seaports & Terminals, to organize interviews and subsequently proceed to hiring of personnel.</p>	<p>Execution of pre-contract measures adopted upon request of the client.</p> <p>Consent of the interested party expressed by sending curriculum vitae.</p>
<p>6. Fulfilment of legal obligations and/or orders from Public Authorities</p>	<p>The company requests an identification document from those persons which must access the terminal of Samer Seaports & Terminals, as well as information on the</p>	<p>Fulfilment of legal obligations in matters of security in ports to which Samer Seaports &</p>

	<p>reason for which authorization to ask the terminal is requested.</p> <p>Other data can be treated within the fulfilment of obligations to which Samer Seaports & Terminals is held on the basis of applicable legislation, such as for example keeping of accounting records, or fulfilment of an order from Public Authorities or exercising the right of defence in cases of legal matters raised against the company.</p>	<p>Terminals is bound.</p> <p>Legitimate interest of Samer Seaports & Terminals to guarantee security at the port structures and terminal.</p>
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4. Faculty to supplying data

The client is free to decide whether or not to supply personal data. Failure to supply the information requested may entail only the impossibility for Samer Seaports & Terminals to meet the requests of the client or to authorize access to the port and Terminal.

5. Recipients of data

Samer Seaports & Terminals uses suppliers of products and services whose personal data can be communicated in the context of the supply relationship to, for example:

- a) Companies within the business group to which Seaports & Terminals S.r.l. belongs;
- b) Insurance companies;
- c) Banking institutes;
- d) Suppliers of professional services, such as commercial consultants, lawyers, labour consultants;
- e) IT service suppliers, such as system administrators, software and network providers, e-mail service providers, web hosting and website designers;
- f) Italian, European and foreign Public Authorities on the basis of applicable jurisdiction, if needed and on the basis of laws and or under orders from the Authorities.

It is understood that the personal data will be used to the sole purpose indicated in this Notice and can be communicated to third parties only should this become necessary to the purpose of achieving the purpose for which they were collected. Aside from these cases, personal data will not be communicated save for specific obligations of law or with specific consent of the party.

6. Data retention time

The company will retain the data only for the needed to achieve the above indicated purposes or, alternatively, in function of the obligations of law to which Samer Seaports & Terminals are bound.

In particular:

PURPOSE	TIME OF RETENION
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Information collected through cookies	For retention time of data collected through cookies, please refer to the cookie policy of this website.
Handling requests for information or quotations	Information regarding requests for information or quotation for services will be retained for the time needed to evade the request or for longer periods in case contractual relationships are established.
Customer care relationships	Documents related to handling commercial relationships with clients will be retained for the time prescribed by law.
Handling of supplier relationships	Documents related to handling of commercial relationships with suppliers will be retained for the time prescribed by law.
Handling of incidents	Documents related to incidents at the Terminal shall be retained until closure of the event and, subsequently, for 10 years.
Handling <i>curriculum vitae</i>	CV received will be retained for a period of no more than six months.

7. Rights of data subjects

In relation to the personal information which Samer Seaports & Terminals collects and treats, the company guarantees the following rights:

- Withdrawal of consent: this allows to obtain interruption of treatment of data when same has been consented, except in case there are further or valid juridical basis for which the company can continue to treat the data even in the absence of consent;
- Access: this allows to obtain confirmation or not of the existence of a treatment in course of personal data retained by the company and, if the case, to access said data and all relative information;
- Amendment: allows to obtain amendment of inexact personal data without unjustifiable delay and, considering the purpose of treatment, to obtain integration of incomplete personal data;

- Cancellation: allows to obtain cancellation of data without unjustifiable delay (for example, when personal data are no longer necessary to the purpose for which they were collected), save for the exceptions provided for by applicable regulations (for example, when retention of data is needed to comply with obligations of law applied to the company);
- Portability: allows, in certain circumstances provided for by applicable regulations, to receive in a structured format, of common use and legible by automatic devices, the personal data supplied to the company;
- Limitation: allows, in certain circumstances provided for by applicable regulations, to obtain a limitation to the treatment of personal data. In these cases, the company can continue to treat the data only in some cases, for example in the exercise of rights or defence or to protect the rights of other physical or judicial persons;
- Opposition: allows, in certain circumstances provided for by applicable regulations, to object to the treatment of personal data unless there are prevailing legitimate reasons, rights or liberties which allow the company to continue in the treatment.

Furthermore, at any time it is possible to file a complaint with the Guarantor for the protection of personal data.