

## PRIVACY POLICY Information pursuant to EU Regulation 2016/679 ("GDPR")

### INFORMATION ABOUT DATA CONTROLLER

Trieste Terminal Passeggeri S.P.A. is the **data controller** of your personal data.

The head office is located in Punto Franco Vecchio Molo IV - 34135, Trieste, and the **contact details** are as follows:  
Management: +39 040 6732365; Administration: +39 040 6732463; Administration office fax: +39 040 6732603;  
Operation office fax: +39 040 6732644; E-mail: [privacy@triesteterminalpasseggeri.com](mailto:privacy@triesteterminalpasseggeri.com)

The Data Protection Officer is Atty. Michele Grisafi, head office located in Trieste, Via del Coroneo 33 (e-mail: [dpo@studiogrisafi.com](mailto:dpo@studiogrisafi.com))

### PURPOSES AND LEGAL BASES FOR THE LEGALITY OF PROCESSING

The company collects and may process, even verbally, common personal data (for example personal details, address, e-mail address, mobile or home telephone numbers, car plate, etc.) also **without specific consent**. The Company collects personal data in order to fulfil legal or financial contractual obligations connected to the activity performed, or in order to provide the services stated by contract or precontract. Personal data may be also processed in compliance to the EU law obligations, due by law, acts with legal force, ordinances and orders of the Public security or judicial authority (e.g., Italian D. Lgs. no. 50/2016, Italian D. Lgs. no. 81/2008, Italian D. Lgs. no. 231/2001, EU Regulation no. 1177/2010 concerning the rights of passengers including assistance for PRM, Port Authority ordinances, Harbour Master ordinances, Public security or judicial authority provisions). Personal data may be processed in case of contractual nonfulfillment, injunction of payments, Litigation Management and debt recovery, also before a court.

The refusal to provide personal data for purposes connected to legal, contractual and precontractual obligations, may involve the impossibility for the company to provide the service required.

The company has a video surveillance system, active 24hrs, located at the entrance/exit area of the parking lot and within the port area. Images are processed by means of electronic devices and in compliance with the legislation for the protection of personal data and to the General measure of the Privacy Authority dated 8<sup>th</sup> of April 2010. The legal basis of the lawfulness of data processing is the pursuit of the legitimate interest of the data controller and the fulfillment of the obligation for the implementation of the security controls foreseen by European, National and local regulations in terms of port and port facility security for the access to the designated areas (e.g. EC Regulation no. 725/2004, Directive 2005/65/EC, Italian D.Lgs. no. 203/2007, Port Authority Ordinances, Harbour Master ordinances).

### PROCESSING METHOD

The data are entered in an electronic database and/or stored in paper files.

The data are not subjected to automated decision-making or profiling of any kind.

### RECIPIENTS OF THE DATA

The personal data may be known by collaborators and employees of the company, as subjects authorised and specially instructed to process them.

The data may be communicated to external subjects (e.g., accountants, lawyers, companies that manage web platforms, debt recovery agencies, insurance companies, etc.) for the purposes outlined above, if there is a need for their involvement and to Public Authorities if due by law (e.g., Judicial Authority, Public security Authority, Port Network Authority, Harbour Master). These subjects will act as autonomous Data Controllers, or will be duly appointed as Data Processors.

**Personal data will not be disclosed**, nor will they be transferred to third countries or international organisations.

### DATA RETENTION PERIOD

The company **will retain the data for a period of 10 years or for the time necessary** to pursue the above-mentioned purposes, to comply with tax, accountancy and legal obligations, or in case of request of the data subject to access and claim his/her personal data. The data processed for security reasons are retained for a period of time compliant to what is stated on the Port Facility Security Plan.

The video surveillance system images will be stored for a period of **24 hrs** during week days and of **48 hrs** during weekends, or for a period of **7 days** for the implementation of the port security controls due by law or by the port facility security plan.

For personal rights' protection before a court or in case of out-of-court disputes, personal data will be retained for the reasonable time needed for such a purpose.

### RIGHTS OF THE DATA SUBJECT

The data subject has the rights as per art. 15-21 of the EU regulation 2016/679, i.e., in summary, to require to the company (above-mentioned contact details) **to access** to, rectify or cancel **personal data** or to limit the processing

activity to the extent to which the data subject is not involved. Furthermore, the data subject has the right to object the data processing as well as retains the right to data portability.

The data subject has the **right to revoke the consent** to treatment at any time, without prejudice to the treatment legitimately carried out until revoked.

If the data subject considers that his rights have been compromised, he has the right to lodge a complaint with the Data Protection Authority, with headquarters in Piazza Venezia n. 11 - 00187 Rome.