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|  | <b>PRIVACY GDPR ORGANIZATIONAL MODEL</b>                           |  |
|  | <b>“LOGISTICS OPERATORS”<br/>ADVISORY<br/>EX ART. 13 E 14 GDPR</b> | Foglio 1 di 5<br>Data 01/10/20<br>Revisione 00 |

## ADVISORY


*to logistics operators (couriers/drivers) in accordance with art. 13 and 14 of the Regulation (EU) 2016/679 of the European parliament and of the council 27<sup>th</sup> April 2016*

On the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR), it is our responsibility to provide you with some information regarding the processing of your personal data given in the context of the relationship with Cereal Docks Marghera S.r.l.

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| <b>Controller</b>   |
| The Data Controller is <b>Cereal Docks Marghera S.r.l.</b> , with registered office Venezia (VE) Via Banchina Molini n. 30 - Marghera, tax code and registration number with the Venezia Business Register: 04040800270 (hereinafter " <b>Owner</b> " or " <b>Company</b> ").   |
| <b>Data Protection Officer (hereinafter “DPO”)</b>  |
| The Controller makes use of the group DPO appointed pursuant to Article 37(2) of the GDPR. The DPO’s contact details can be found on the Controller’s website or at the Controller’s registered office. To exercise your rights and for any communication, problem and/or request for clarification regarding the protection of your personal data, you may freely contact the DPO. |

### **Mandatory monitoring for which the processing does not require your consent**

| Purpose   | Lawfulness of processing  |
|---|---|
| Process any pre-contractual phase, the performance and fulfillment of contractual obligations assumed.  | (Art. 6, paragraph 1, lett. b), GDPR)<br>Performance of a contract  |
| Fulfillment of accounting and tax obligations;  | (Art. 6, paragraph 1, letter b), GDPR) Performance of a contract<br>(Art. 6, paragraph 1, letter c), GDPR)<br>Processing is necessary for compliance with a legal obligation to which the controller is subject;<br>(Art. 6, paragraph 1, letter f), GDPR)<br>Processing is necessary for the purpose of the legitimate interest pursued by the controller related to the organizational, administrative, financial and accounting management of its own organization |
| Manage the storage and retention of data, information, communications, including electronic communications, and documents related to the relationship with the Company. | (Art. 6, paragraph 1, letter c), GDPR)<br>Processing is necessary for compliance with a legal obligation to which the controller is subject   |

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| Access control in the Company | (Art. 6, paragraph 1, letter f), GDPR)<br>Processing is necessary for the purpose of the legitimate interest pursued by the controller related to the organizational, administrative, financial and accounting management of its own organization |
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### **Categories of personal data**

Personal data, data related to the driving licence, details of licensed road haulier.

### **Source of data - where personal data have not been obtained from the data subject**


The source from which the personal data originates is the third party who commissioned the transport service.

### **Recipients of personal data**

For the pursuit of the above mentioned purposes, your personal data may be communicated to:

- Employees and / or collaborators of the data controller, duly appointed as authorized and instructed on how to process such data;
- other companies of the 'Cereal Docks' Group for the management of specific functions and/or services;
- third parties differing from the data controller, such as:

| Third party or categories  | Purposes  | Notes  |
|--|---|--|
| Computer companies   | Management, maintenance, updating of systems and software used by the Data Controller   |  |
| Suppliers of networks, electronic communication services and computer and electronic archiving service, preservation and computer management of data | Hosting, housing, Cloud, SaaS and other indispensable remote IT services for the provision of the data controller's activities; regulatory storage and archiving services to electronic documents | Cloud services may involve data processing in countries outside the EU, which guarantee suitable confidentiality rights. |
| Consultants, professionals, legal offices, arbitrators, insurance companies, experts, brokers.   | Judicial and extra-judicial activity, insurance activity in case of claims.<br>Organizational, administrative, financial and accounting management  |  |
| Public Administrations and Public Bodies in general  | Management of requests by control bodies.<br>Fulfillment of legal obligations   |  |
| Public Safety Authorities and Justice system   | Management of investigations by bodies investigators in case of accidents   |  |

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The companies of the Cereal Docks Group and third parties to whom your personal data may be communicated act as:

- data controllers, i.e. subjects who determine the purposes and means of processing personal data;
- data processors, i.e. subjects who process personal data on behalf of the Data Controller;
- joint processing controllers who determine together with the Company the purposes and means of the processing.

The list and updated information of the persons identified as data controllers, processor or joint controllers is available from the Company.

### **Period of retention of personal data**

We explain below the period of retention of personal data or, if this is not possible, the criteria used to determine such period.


| <b>Personal data and documents</b>                            | <b>Period of retention or criteria to determine it</b>   |
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| Records and documents related to the contractual relationship | For the necessary duration of pursuing the purposes of processing and also subsequently, within the limits granted by law, for administrative and accounting purposes, as well as to enforce or protect the rights of the Data Controller, where necessary |

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### **Rights of the data subject**

We inform you about the existence of certain rights provided for by GDPR with regard to personal data and related processing that you may request from the data controller.

| <b>Right</b>  | <b>Description</b>  | <b>Way to make it effective</b>                       |
|---|---|---|
| Right of withdrawal of consent (Art. 13, Paragraph 2, letter c) | You have the right to withdraw consent for the processing operations for which you are requested, without prejudice to the lawfulness of processing based on consent prior to withdrawal  | Forms available on the website or from the Controller |
| Right of access to data (art. 15)                               | You may request: (a) the purposes of the processing; (b) the categories of personal data concerned; (c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if they are recipients from third countries or international organizations; (d) where possible, the expected retention period for the personal data or, where that is not possible, the criteria used to determine that period; (e) the existence of the right of the data subject to request the controller to correct or erase the personal data or to restrict the processing of personal data concerning him or to object to their processing; (f) the right to lodge a complaint (g) all available information on the origin of data, if they are not collected from the data subject; (h) the existence of an automated decision-making process, including profiling as referred to in Article 22 (1) and (4), and, at least in such cases, relevant information on the logic used and the importance of and the anticipated consequences of such processing for the data subject. You have the right to request a copy of the personal data being processed | Forms available on the website or from the Controller |
| Right of rectification art. 16)                                 | You have the right to request the rectification of inaccurate personal data concerning you and to obtain the integration of incomplete personal data  | Forms available on the website or from the Controller |
| Right to be forgotten (art. 17)                                 | You have the right to obtain from the Controller the cancellation of personal data concerning you if the personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed  | Forms available on the website or from the Controller |
| Right to limitation of processing (art. 18)                     | You have the right to obtain from the Data Controller the restriction of the processing when you have contested the accuracy of the personal data (for the period necessary for the Data Controller to verify the accuracy of such personal data) or if the processing is unlawful, but you object to the deletion of the personal data and instead request that their use be restricted or if they are necessary for the establishment, exercise or defense of a right in court, while the Data Controller no longer needs them.   | Forms available on the website or from the Controller |

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| Right to portability (Article 20)                               | You have the right to receive in a structured format, commonly used and readable by automatic device personal data concerning you provided to us and have the right to transmit them to another Controller if the treatment: (i) was based on consent, (ii) on contract and (iii) whether the processing is carried out by automated means, unless the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority and such transmission does not infringe the rights of a third party. | Forms available on the website or from the Controller |
| Right of opposition (art. 21)                                   | You have the right at any time to object, in whole or in part, to the processing of your personal data if the processing is carried out for the pursuit of a legitimate interest of the Controller or if the processing is carried out for direct marketing purposes..  | Forms available on the website or from the Controller |
| Right to lodge a complaint with the Control Authority (art. 77) | You have the right to complain to the Control Authority if you consider that the processing of your data is in breach of the GDPR.  |   |

The exercise of these rights is subject to the limits, rules and procedures laid down by the GDPR and which the interested party must know and implement. Furthermore, in accordance with the provisions of article 12, paragraph 3, the Controller shall provide the interested party with information relating to the action taken without undue delay and, in any case, no later than one month after receipt of the request. This period may be extended by two months, if necessary, taking into account the complexity and number of requests. The Data Controller shall inform the data subject of such extension, and of the reasons for the delay, within one month of receipt of the request.

### **Amendments and updates**

This statement may be subject to change and/or addition, also as a result of the applicability of the GDPR and any future changes and/or regulatory updates.

The updated information is constantly available on the website of the Controller

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The personal data provided may be processed by the Data Controller with or without the use of computerized means.

We also inform you that the communication of your personal data for the mandatory purposes indicated is a legal or contractual obligation or a necessary requirement for the performance of contractual obligations, so you have the obligation to provide personal data, because otherwise you will not be able to manage the relationship with the Company.