

# Privacy Notice

## Ship Agency

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

This privacy notice has the purpose of describing the treatment of personal data effected by Samer & Co. Shipping S.p.a. (hereinafter also the "Company") in the context of their activity as ship agents.

### 1. Data Controller

Samer & Co. Shipping S.p.a., with registered office at Piazza dell'Unità d'Italia 7, Trieste 34121 (TS).

Telephone: +39 040 6702711

Fax: +39 040 67027300

E-mail: [privacy@samer.com](mailto:privacy@samer.com)

### 2. Type of data treated

Samer & Co. Shipping S.p.a., in their capacity as ship agents, can treat data referred to physical persons and, in particular, name and surname, identifying data contained in identity documents, tax code, sex, nationality, date and place of birth, qualifications, destination, e-mail address, telephone number, payment methods and, in case of need, also particular information regarding the health conditions of the party in case of injuries or pathologies arising during the voyage.

### 3. Purposes and juridical basis for treatment

Personal data is treated by the Company to satisfy requests for information and quotations of voyages, for the conclusion, management and execution of transport contracts by sea and/or air and for all related legal and security aspects such as elaboration, reception and transmission of embarkation and landing lists referred to crew and passengers of ships and/or airplanes to the competent authorities, terminals and port security offices. The information can also be used to the purpose of supplying ships with any services and/or products requested by the ship owner, to obtain from the competent Authorities authorisations for access on board of technicians, visitors and relatives of the crew, to send updates on the status of the voyage, for invoicing and fulfilment of tax and accounting obligations of the Company, to organize hospitalization or other emergency measures in case of need, as well as for any other operation needed to the conclusion, administration and execution of the transport data.

The following are the juridical basis for treatment:

- a) execution of transport contract and/or adoption of pre-contractual measures to the purpose of concluding the contract;
- b) fulfilment of legal obligations to which the Company is bound in tax and accounting matters, as well as in relation to port security;

- c) in case of particular data, protection of a vital interest of the party or other physical person;
- d) in case of controversy, the legitimate interest of the Company to exercise its rights.

#### 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 the Company to implement the transport contract and/or to allow access to the port and on board ships.

#### 5. Recipients of data

To the purpose of implementing the transport contract, Samer & Co. Shipping S.p.a. can communicate data to:

- a) terminals, Port Authorities, law enforcement authorities, judicial authorities;
- b) Banking institutes;
- c) Insurance companies;
- d) Suppliers of professional services, such as commercial consultants, lawyers, labour consultants;

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 for the period of time of execution of the transport contract and subsequently for the time established by law and/or determined by the arising of a controversy.

#### 7. Transmission abroad of data

Personal data can be communicated to organisations based abroad for reasons related to execution of the transport contract (for example in the case of foreign ship owners) or for judicial or national security purposes to foreign authorities according to law, controversies or requests for communication.

#### 8. Rights of the interested parties

In relation to the personal information which Samer & Co. Shipping S.p.a. 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);

- 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.