

# Privacy Notice

## Freight Forwarding – Project Cargo – Warehousing/Logistics

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 of forwarding by land, sea and air, as well as organisation of project cargo transports.

### 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

a) Data supplied by the client: Samer & Co. Shipping S.p.a. can collect client data in relation to requests for information and quotations, in the field of concluding forwarding contracts, for transport orders, transmission of paper or e-mail correspondence to material available on web site or elsewhere, exhibitions and/or events, such as for example, names, surnames, telephone numbers, addresses, e-mail, bank coordinates, identification of legal representatives or company officers, tax codes, information related to identity documents or any other information voluntarily supplied to the Company by the client in the context of execution of forwarding activity.

### 3. Purposes and juridical basis for treatment

The personal data treated by the Company in virtue of the juridical basis and purposes are indicated here below:

Purposes	Further information	Juridical basis
1. Satisfy requests for information and estimates, supply requested services	In the context of supplying land, sea and air forwarding services, the Company can treat identifying and contact information of legal representatives and company officers of the client, bank coordinates, tax codes, payments, to the purpose of supplying the requested services and fulfil the related obligations, such as	

	<p>assistance and support, invoicing, handling of payments, caring for client contacts, book-keeping etc.</p> <p>The Company can receive the same personal information from the forwarding agent network with which it cooperates. Said data will be handled exclusively according to the method, purpose and juridical basis set out in this Notice to the purpose of executing the ordered forwarding.</p> <p>To the purpose of organising forwarding, some information may be transmitted to the suppliers who, on behalf of the Company, effect the land, sea or air transport service.</p> <p>The Company can also acquire copy of identity documents of clients for performance of customs operations which can be transmitted to the operators who perform this service on behalf of the Company.</p>	
2. Research and obtain services functional to forwarding activities.	<p>In the field of their business, the Company uses transport service suppliers, in relation to which information can be collected, such as tax code, name and surname, address, contact references or other personal identity elements needed to establish and/or execute commercial relationships.</p> <p>The data is used by the company to the sole purpose of implementing a commercial relationship with the suppliers, effecting payments for services received, caring for relationships with suppliers, accounts records, etc.</p>	Execution of the contract to which the client is party and/or adopting pre-contractual measures in their interests.
3. Fulfilling legal obligations and/or order from public Authorities.	Other client data can be treated in fulfilment of obligations to which Samer & Co. Shipping S.p.a. is held on the basis of applicable legislation, such as retention of	Legal obligation to which Samer & Co. Shipping S.p.a. is bound.

	<p>accounting records, or fulfilment of an order from a Public Authority or the exercise of a right of defence in case of proceedings instated by or against the Company.</p> <p>The Company can furthermore acquire copies of client identification documents (clients and suppliers) that need to access the port area, to the purpose of handling the necessary authorisation requests from the competent Port Authority System to whom the data is transmitted.</p>	<p>Legitimate interests of Samer &amp; Co. Shipping S.p.a. to guarantee their rights of defence.</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 the Company to implement the client's requests and/or to perform the contract.

#### 5. Recipients of data

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

- a) Transport companies;
- 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 administrations, software, network and e-mail service providers, web hosting and web site designers;
- f) Italian, European and foreign Public Authorities on the basis of applicable legislation, if needed on the basis of law or by order of an Authority.

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 above indicated purposes or, alternatively, in function of their obligations according to law:

In particular:

Purpose	Retention time
Handling requests for information, quotations and transport orders	Data related to requests for information, quotations for services and transport orders shall be retained for such a time as needed to satisfy the request or for the time prescribed by law in case of actual establishment of a contractual relationship. The data can be retained for a longer period than indicated above in case of controversies between the Company and the client.
Handling of relationships with clients	Documents related to handling of commercial relationships with clients will be retained for the time prescribed by law.
Handling of relationships with suppliers	Documents related to handling of commercial relationships with suppliers will be retained for the time prescribed by law.
Handling of requests for access to port areas	Documents related to handling of requests for access to port areas will be retained for the time needed to care for the request for access to port areas.

## 7. 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);
- 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.