

Information pursuant to Art.13 of European Regulation 2016/679

In accordance with Art. 13 of Regulation (EU) 2016/679 (hereinafter for brevity "GDPR") and in relation to personal, common, sensitive and court-related data which Società Alpe Adriatica S.p.A. (hereinafter for brevity "Alpe Adria") shall get hold of to carry out its business activity (hereinafter for brevity "Data") we inform you as follows.

1. Data Controller

The data controller is Alpe Adria (VAT number: 00811010321) with headquarters in Via Santa Caterina da Siena, 1, in Trieste (hereinafter for brevity "Data Controller").

Please find here below the contact information: tel: 0409712611 e-mail: privacy@alpeadria.com - pecalpeadrialogistica@pec.it

1.2 Data will be processed also by subjects authorized by the Data Controller and by processors. The complete and updated list of the authorized entities and processors is available by contacting the Data Controller at the following e-mail address: privacy@alpeadria.com

2. Purpose of data processing

2.1 Data shall be processed for the purpose of the correct and complete performance of the task received according to the specified, explicit and legitimate purposes (hereinafter for brevity "Task"). The legal basis for the data processing is the need to carry out the Task the Data Controller is entrusted with. The data retention period in relation to data processing correspond to the duration of the Task in addition to the retention period required by law for specified accounting and administrative documents.

2.2 Furthermore, data shall be processed for the purposes provided for by the law applicable to the business activity of Alpe Adria also with regard to anti-money laundering. The legal basis for the processing is the need to comply with the obligations provided for by law. The data retention period in relation to the processing corresponds to the data retention period provided for by aforementioned law.

2.3 Data can also be processed to prevent or control illegal behaviour or to protect and enforce rights. The legal basis for this treatment is the legitimate interest of Alpe Adria to protect its rights and prevent offences. The data retention period corresponds to the reasonably necessary time to enforce the rights of Alpe Adria from the moment we learn about a threat of legal action or an offence or its potential commission.

3. Nature of processing and consequences of a possible refusal to answer

3.1 The transfer of Data for the purposes referred to in art. 2 is compulsory. Therefore, in case of refusal, it would not be possible for the Data Controller to perform correctly and exhaustively the task conferred on It.

4. Transfer of data

4.1 Data – for the purpose of performing the task (purposes referred to in par. 2.1) and to fulfill the obligations established by law (purposes referred to in par. 2.2) - may be communicated to external collaborators of the Data Controller, our trusted banks, companies that operate in the logistic, rail transportation sector and transportation sector in general, to our partners entrusted with the performance of the Task and - in general - to all those subjects to whom such transfer is necessary for the correct fulfillment of the Task.

4.2 Furthermore, Data may be communicated to the police forces, judicial bodies and other public entities in compliance with legal obligations connected to the Task (purposes referred to in par. 2.1 and 2.2) and for the purposes referred to in par. 2.3.

4.3 Lastly, data may be communicated to external entities for the purposes of performing the Task (purpose referred to in par. 2.1)

4.4 All the entities that process data on behalf of Alpe Adria shall be identified and contractualized in accordance with Art. 28 GDPR. They shall be provided with adequate information about the data processing to be done and it shall be verified periodically that they respect aforementioned instructions and, in general, that they provide sufficient guarantees to implement adequate technical and organizational measures in such a manner that data processing will meet the requirements of GDPR and ensure the protection of the rights of the data subject.

4.5 With regard to electronic mail, Alpe Adria utilizes services provided by third parties located outside the European Union. These parties operate as processors in accordance with agreements pursuant to Art. 28 GDPR with standard contractual clauses in compliance with the Decision of the European Union concerning the protection clauses approved by the European Commission or by virtue of a Decision of an adequacy decision issued by the European commission with regard to the level of data protection (Privacy Shield).

Società Alpe Adria S.p.A.

Via Santa Caterina da Siena, 1
34122 Trieste (Italy)

P +39 040 9712611
info@alpeadria.com

www.alpeadria.com

These entities only get hold of the personal data necessary to fulfill their functions and shall only utilize them for the purposes of providing such services on behalf of the Data Controller or to comply with law. The updated list of the third party service providers which operate as processors in accordance to Art. 28 GDPR is available by contacting the Data Controller at the following e-mail address: privacy@alpeadria.com.

5. Data processing methods

5.1 Data processing is performed by means of operations or set of operations indicated in Art.4, subparagraph 2 of GDPR and precisely: collection, recording, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, transfer, erasure and destruction.

5.2 Data shall be processed on magnetic media, with the help of IT and telematic tools and on paper, in full compliance with the requirements of confidentiality and security required by law.

6. Personal data dissemination

Personal data shall not be subject to dissemination.

7. Data transfer abroad

The Data Controller and processors shall have the right to store data inside electronic mailbox abroad on the basis of contracts signed and pursuant to Art. 28 GDPR, with standard contractual clauses in accordance with European Commission Decision concerning protection clauses or by virtue of an adequacy decision about the level of protection of personal data (Privacy Shield) issued by the European Commission. The updated list of these entities which operate as processors in accordance with Art. 28 GDPR, is available by contacting the Data Controller at the following e-mail address: privacy@alpeadria.com.

8. Rights of the data subject

8.1 The data subject shall have the right to contact Alpe Adria to ask for the access to its personal data, rectification, erasure, restriction of processing of personal data, to object to such processing and request the portability of its data. Furthermore, the data subject shall have the right to withdraw his or her consent at any time (the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal).

8.2 The data subject shall have the right to lodge a complaint with the Supervisory Authority for Personal Data Protection (for further information please consult the following website: www.garanteprivacy.it) and to ask at any time the Data Controller information about the processors and about the entities authorized by the data controllers to process its data.

8.3 The data subject shall have the right to exercise its rights by contacting the Data Controller at the following e-mail address: privacy@alpeadria.com.

9. Purpose of the processing other than the original

Where the Data Controller intends to process the personal data for a purpose other than that for which the personal data have been collected, before such further processing, the Data Controller shall provide the data subject information with regard to such other purpose and any further relevant information.

10. Profiling

The Data Controller does not utilize automated processes designed to execute profiling.

11. Security of processing

The personal data subject to processing are subject to the adequate security measures with the aim of reducing to a minimum risks arising from destruction and/or loss, unauthorized access, unauthorized or not allowed processing or not in accordance with the purposes of collection.

Società Alpe Adria S.p.A.