

# **Personal Data Protection Policy**

(Pursuant to Articles 13 and 14 of the General Data Protection Regulation EU 2016/679)

## **1. About Adriatica Marina per lo sviluppo di iniziative Turistico Portuali s.r.l. (data controller)**

The company Adriatica Marina per lo Sviluppo di iniziative Turistico Portuali - S.r.l., with registered office in Via Monte Ortigara 3 - Località Punta Faro, 33054 Lignano Sabbiadoro (UD), Italy, with fiscal code, VAT no. and registration with the Companies' Register of Pordenone-Udine no. 00283920304 (hereinafter "the Company" or "we") is dedicated to protect the confidentiality and privacy of information entrusted to it and complies with personal data protection legislation in force. The Company is the data controller of the personal data of the users of this website. Our commitment to privacy is a natural extension of our commitment to confidentiality towards our customers, employees and all parties that transact with the Company. This policy applies to all personal data being processed by the Company's staff, external contractors, service providers and other third parties acting for the account of the Company. We invite you to carefully read this Personal Data Protection Policy, which sets out in which context we are processing your personal data and explains your relevant rights.

## **2. Principles of processing of your personal data**

In line with the General Data Protection Regulation of the EU (GDPR) and the applicable Italian laws, the Company has introduced a data protection framework for the processing of personal data in order to comply with the following principles:

- Personal data are processed fairly, lawfully and transparently.
- Personal data are processed only where strictly necessary for lawful, regulatory or other legitimate purposes.
- Processing of personal data involves only the data required for these purposes
- Processing includes only accurate and updated personal data
- Personal data are processed only for the period required for the processing purposes.
- Personal data are processed in a manner that ensures appropriate security against unauthorized processing, loss of confidentiality, integrity or availability by implementing appropriate technical or organizational measures

## **3. What personal data we collect about you and from which source the personal data originate?**

This information and personal data may either be directly provided by you or the legal entity for which you work for or provided by a third party (supplier, service provider, business partner etc). We may collect various types of personal data about you, depending on whether you are a client, a business associate or an employee of the Company when you contact us for an inquiry or remark through completion of our contact form, when you request a berth at the premises of the marina, when you send us your CV to apply for a job and generally when you visit and use our website. Personal data may indicatively include:

- your identification data (e.g. name, surname, email and/or postal address, fixed and/or mobile phone number)
- data included in your CV (such as marital status, job description, education, professional experience, data of previous employers);

- financial information (e.g. bank account details, IBAN); and
- your electronic identification data where required for the provision of services by our Company (e.g. login, access right, IP address, online identifiers/cookies, logs, access and connection times).

## **4. Purposes and legal basis of processing**

Your personal data are processed only for specific and legitimate purposes which undergo a lawful and proper basis for processing. More specifically, we process your personal data for the following purposes and on the following legal basis:

- Handling of a request for information on berthing at the marina and/or handling of a booking request submitted through the online berth request form.

Legal basis: pre-contractual measures or performance of a contract (berthing contract).

- Handling of a request for a career opportunity with the Company submitted through the online career form.

Legal basis: pre-contractual measures and, upon hiring, performance of employment contract.

With reference to the possible presence in the Curriculum Vitae of special categories of personal data, the legal basis of the processing is the General Authorization of the Italian supervisory Authority n. 1/2016.

For the handling of berthing requests and berthing booking as well as for a request for a job with us, the provision of personal data is a necessary requirement for the execution of pre-contractual and contractual measures and failure to provide them will make it impossible for us to answer your requests of any kind and to provide our services to you.

- Disclosure to tax or other public or regulatory authorities, port authorities, law enforcement agencies  
Legal basis: compliance of our Company with legal or regulatory obligations.

- Marketing of services and products of our Company including dispatch of newsletters and commercial marketing messages about our marina, participation in the D- World loyalty program and any other similar program or campaign to be launched.

Legal basis: your consent that you can withdraw at any time.

## **5. Who has access to your personal data and to whom are they transferred?**

Your personal data are processed internally by the employees of the Company who need to process them in order to carry out their duties and provide services to you. We do not share personal data with third parties, except when it is necessary to fulfil our obligations, to respond to your requests, to serve our legitimate interest and/or as required by law.

To this purpose, we will share your data with affiliated companies within D Marin Group which provide various services to our Company, such as management, finance, strategic planning, pricing, marketing and communications, procurement, IT support in compliance with data transfer requirements.

We may also share your personal data with persons or companies that we work with for the operation/technical support of our webpage, other service providers such as marketing companies, advertisers, media agencies for the purposes of marketing and research.

We may also have to provide your personal data to tax or other public authorities or to law enforcement agencies in order to comply with our statutory obligations or an order.

When we work with business partners, service providers or agencies which process your personal data on our behalf, we ensure that they are bound by contractual obligations to maintain the confidentiality and security of your personal data at least equivalent to those with which we are obliged to comply.

We don't transfer personal data outside the EEA, but when we may do this, we shall ensure that adequate safeguards are taken as required by the GDPR.

## **6. Protection of your personal data**

We ensure that your personal data processed is secure against unauthorized processing, loss of confidentiality, integrity or availability by implementing appropriate technical and organizational measures such as malware protection, firewalls and cryptography technologies, access limitations, strictly defined employee tasks, trainings, internal and external audits, business continuity and recovery procedures. We also have in place data breach management procedures. We impose same obligations to third parties that process your personal data for the account of the Company.

## **7. How long do we retain your personal data?**

We will keep and process your personal data only for as long as it is necessary for the fulfilment of the purpose for which they are processed or for the fulfillment of its legal obligations. The retention period may vary significantly depending on the category of the data. To determine the appropriate retention period of your personal data, we take into consideration also the nature and sensitivity of personal data, the time periods for which we are required by law or by contract to do so, the statute of limitations in order to be able to deal with potential claims, any outstanding or threatened court proceedings. The retention periods are provided in the Data Retention Policy of the Company.

## 8. Your privacy rights

You have the following rights with respect to your personal data.

Right of information	You have the right to be informed about the processing of your personal data.
Right to access	You have the right to request access to your personal data being processed by the Company in a brief, comprehensible, transparent and easy manner.
Right to rectification	You have the right to request the Company to rectify any inaccurate or outdated personal data without undue delay or to complete any incomplete personal data of yours.
Right to be forgotten	You have the right to request the Company to erase your personal data provided that the processing is not necessary for the purposes of processing. If for example the processing is necessary for the fulfillment of lawful obligations of the Company or for the defense of lawful rights of the Company, your request may be rejected.
Right to restrict the processing	You have the right to request the Company to restrict the processing under certain conditions and only for specific purposes
Right to object	You have the right to object on ground related to your particular situation at any time, in which case the Company is obliged to not further process your personal data unless there are compelling and lawful prevailing grounds.
Right to data portability	You have the right to receive your personal data in a structured, commonly used and machinereadable format and, in some cases, we shall transmit your data, upon your request, to another controller, provided this is technically feasible, unless the rights of others are adversely affected.
Right to revoke your consent	You have the right to revoke your consent at any time without prejudice to the legality of the processing based on your consent until that time. In any case the Company informs you that the revocation of your consent may entail that a contract cannot be performed and that, in such case, the Company has the right to terminate the contract with you.

For the exercise of your abovementioned rights and for any explanation or clarification in connection with the above, you may contact us by email at [pun tafaro@d-marin.com](mailto:pun tafaro@d-marin.com) or send us a letter to the abovementioned registered address of the Company. You also have the right to lodge a complaint with the Italian supervisory authority at <https://www.garanteprivacy.it/>

## 9. Automated individual decision-making, including profiling

We don't make decisions based solely on automated processing, including profiling.

The Company reserves the right to mend and update this Policy from time to time; so please check this page periodically.