

Privacy Policy pursuant to Sections 13 and 14 of EU Regulation 2016/679 (General Data Protection Regulation)

Ambrogio Trasporti SpA (hereinafter referred to as “Ambrogio”) in the role of Data Controller, hereby confirms that any personal data belonging to his/her clients, suppliers, employees and consultants will be processed in compliance with the provisions specified in the EU 2016/679 REGULATION (“GDPR”) for the purposes and in the manner specified in the Privacy Policy.

Data Controller

The Data Controller is Ambrogio Trasporti SpA with its headquarters based at Via F.lli Kennedy, 1 – 10048 Vinovo (TO), Italy, VAT Reg. No. and Italian Code Card no. 00510420011, R.E.A. Turin no. 421977.

Processing purposes

Personal information is a prerequisite for delivering the services provided by Ambrogio, with specific reference to the correct contractual, administrative and correspondence management, as well as for purposes connected to the fulfilment of legal, accounting and tax obligations. Failure to provide such data may make it impossible to fulfil the purpose for which any personal data has been collected.

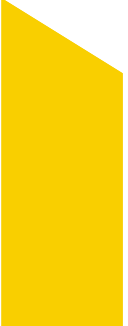
In addition to these purposes, Ambrogio may ask the parties in question to provide their free, specific, informed, unequivocal and explicit consent to the specific processing of personal information for the pursuit of additional purposes specifically highlighted and specified in cases of interest.

Processing methods

The processing of personal information for the purpose of this policy, pursuant to Section 4.2 of the GDPR is understood to mean: “any transaction or series of transactions processed with the aid of either computerised/automated or manual resources which are applied to any personal information as referred to in the GDPR, such as the collection, registration, organisation, storage, adaptation or modification, extraction, consultation, usage, communication via transmission, circulation or any other form of provision, comparison, interconnection, limitation, cancellation or destruction”.

Any processing will be carried out by Ambrogio using electronic (or in any case automated) methods or by manual or paper processing, so as to guarantee the confidentiality and security of personal data in relation to the administrative procedure managed. The data may be processed, in compliance with legal obligations, by the Data Processors authorized personnel, as well as third parties who have been specifically appointed by Ambrogio as External Data Processors.

Ambrogio specifically observes security, technical and organisation measures to prevent the risk of destruction, loss, modification or any unauthorised disclosure or access, accidentally or illegally, to personal data processed.



Scope of data communication

The communication and disclosure of personal data is carried out exclusively under the circumstances provided for under existing legislation and for the performance of some relative activities.

Personal information may be disclosed to public or private authorities as specified for the purposes highlighted, albeit the list below is not exhaustive:

- companies
- banks
- financial authorities or public institutions
- legal practices
- subsidiaries

Ambrogio will continue to have an obligation to inform the Judicial Authorities every time a specific, detailed and formal request is submitted in relation thereto.

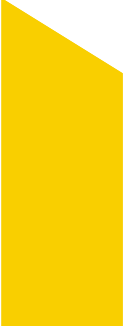
Data retention period

Any personal information processed for the purposes specified will be stored so that it complies with the principles of proportionality, adequacy and necessity until the time where the purposes for processing have been honoured by Ambrogio and have been honoured under all of the circumstances within the limitations demanded by laws and regulations.

As a rule, any personal information shall be retained specifically provided that there is a relationship with Ambrogio, with the exception of any additionally protracted requirements associated with recovering any receivables and/or managing any data in the event of any disputes/complaints/legal disputes, as well as for the purpose of any requests submitted by the Judicial Authorities. These shall be expunged ten years after any contractual relationship has been terminated regardless of the circumstances, without prejudice to the aforementioned requirements and in terms of honouring further legal obligations.

Rights of interested parties

The interested parties may exercise the following rights at any time as acknowledged by the GDPR in relation to any personal information being disclosed:

- to access personal information, obtaining evidence of the purposes being fulfilled by Ambrogio, the data categories in question, the recipients to whom it may be disclosed, the applicable retention period and the presence of automated procedures;
 - to request that any inaccurate personal information in the interests of an individual be corrected without delay;
 - to request that any personal information be cancelled under foreseen circumstances;
 - to request a limitation on processing or to oppose processing whenever possible; Ambrogio has the opportunity to prove that there are legitimate cogent reasons to continue processing or to ascertain, exercise or defend a right before the courts;
 - to request the portability of information provided to Ambrogio, i.e. to receive this in a structured format which is commonly used, which can be read by automatic equipment and
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which can be transmitted to another Data Controller within the limitations and under the constraints pursuant to Art. 20 of the GDPR;

- to make a complaint to the Authority for Personal Data Protection by following the procedures and instructions published on the official authority website:

WWW.GARANTEPRIVACY.IT.

Please send a message to the Data Processor via the following e-mail address should you wish to exercise your rights and withdraw your consent (where applicable) and to obtain further information regarding your personal information: privacy@ambrogiointermodal.com

