

## PRIVACY POLICY

The present privacy policy (hereinafter the "**Policy**"), provided by APM Terminals Vado Ligure S.p.A. (the "**Company**") contains the information required by Article 13 of Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data (hereinafter the "**GDPR**").

1 INTRODUCTION

For the purposes of the present Policy, *processing* means any operation performed with or without the aid of automated processes and applied to personal data, such as collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of provision, comparison or interconnection, limitation, cancellation or destruction, as defined in Article. 4 paragraph 1 letter a) of the Code and Article 4 paragraph 1 of the GDPR (hereinafter the "**Processing**").

2 DATA TO WHICH THIS POLICY REFERS

Pursuant to art. 4, paragraph 1 of the GDPR, "personal data" is "any information concerning an identified or identifiable natural person ("Data Subject"); an identifiable person is considered to be the natural person who can be identified, directly or indirectly, with particular reference to an identifier such as name, an identification number, location data, an online identifier or to one or more elements characteristic of his physical, physiological, genetic, mental, economic, cultural or social identity".

**The Data processed includes, by example but not limited to, image, name, surname, place and date of birth, tax code, sex, telephone and e-mail contacts or other elements of personal identification of the person concerned.**

3 PURPOSES FOR WHICH THE PROCESSING REQUIRES THE LEGAL BASIS OF CONSENT

After your specific, optional, consent and until revocation of the same, the Data may be processed by the Company for commercial purposes and / or promotional, for example, for reproduction at trade fairs (both in Italy and abroad), competitions, exhibitions, advertising publications, websites of the Company, profiles of social networks managed by the Company (Facebook, Instagram, LinkedIn, YouTube, Twitter) films and corporate communications or transfers to third parties for purposes of the Company.

It is understood that your consent to the processing of your data for the above purpose **is purely optional**; therefore, in the event of your refusal to the Processing, the data will not be processed.

4 MODALITIES OF THE PROCESSING

Data processing is based on the principles of correctness, lawfulness and transparency. Data processing may also be carried out by automatic methods designed to store, manage and transmit them, by means of technical and organisational measures suitable to guarantee the security, confidentiality, integrity, availability and resilience of systems and services, through the use of appropriate procedures that avoid the risk of loss, unauthorised access, unlawful use and dissemination.

5 PERIOD OF DATA RETENTION

The Data processed for the purposes for which this Policy will be kept until revocation of consent. Once the above mentioned storage terms have expired, the Data will be destroyed or made anonymous.

6 EXTRA-UE DATA TRANSFER

The Data may also be transferred to non-EU countries exclusively to companies that are part of A.P. Møller – Mærsk A/S Group. In this case, the Data will be processed in accordance with the prescriptions set out in art. 45 et seq. of the GDPR.

7 RIGHTS OF THE DATA SUBJECT

According to the GDPR, the Data Subject are entitled to the rights set out in Articles 15 to 22 of the GDPR, where applicable. In particular, Data Subject have the right to:

- a) request to the Data Controller access to the Data, deletion if required by law, and limitation of processing in the cases provided for in Art. 18 of the GDPR.
- b) oppose, at any time, in whole or in part, the processing of Data.
- c) submit a complaint to the competent Authority.

These rights may be exercised by writing to: APM Terminals Vado Ligure S.p.A., Banchina Raffaello Orsero snc - Porto Vado, Bergeggi (SV); or by e-mail: [apmtvado@legalmail.it](mailto:apmtvado@legalmail.it)

8 IDENTITY AND  
CONTACT  
DETAILS OF THE  
DATA  
CONTROLLER

We inform you that the Data Controller is APM Terminals Vado Ligure S.p.A., in the person of the legal representative pro tempore, with registered office in Banchina Raffaello Orsero snc - Porto Vado, Bergeggi (SV), (Italy), e-mail: [apmtvado@legalmail.it](mailto:apmtvado@legalmail.it)