

Dear Guest,

the International Code for the Safety of Ships and Port Facilities - ISPS Code, the GDPR General Data Protection Regulation - EU Regulation 2016/679 ("GDPR") and, where applicable, the Legislative Decree 30 June 2003 no. 196, require to collect some information about the people who access our facilities.

For this reason, we request your cooperation to fill in the forms specially prepared by us with the requested information.

Information on the protection of personal data

Pursuant to Article 13 of the GDPR and Article 13 of the Code regarding personal data protection, Legislative Decree 30 June 2003 no. 196, the companies APM Terminals Vado Ligure S.p.a. and Reefer Terminal S.p.A., both with operational headquarters in Bergeggi (SV), Banchina Raffaello Orsero SNC, Porto Vado 17028, as Data Controller, informs you of the following:

- a) the processing of personal data provided falls within the conditions of lawfulness as per art. 6, par. 1, lett. c), of the GDPR, being finalized to the management of the procedures foreseen by the International Code for the Safety of the Ships and Port Facilities - ISPS Code, and to the release by the Harbor Authority of Savona of the authorization of access to the port areas of Vado;
- b) in particular, the personal data that we request during our visit to our headquarters located in North Harbor Vado di Bergeggi (SV), necessary for the release by the Western Liguria Sea Authority of Savona of the aforementioned authorization, are collected for purposes of significant public interest in application of the rules on security, whose regulatory source is constituted by the EC Regulation n. 725/2004 on the improvement of the safety of ships and port facilities in relation to terrorist threats and international illicit actions as well as the provisions contained in the ORDER n. 3/2005 of the West Ligurian Sea System Authority of Savona on July 22, 2005 concerning the application of a system for the issue and control of authorizations for access to the port areas of Savona - Vado;
- c) the processing of data will take place in such a way as to guarantee security and confidentiality and may be carried out using electronic and paper means, in the manner and within the limits necessary to pursue the aforementioned purposes;
- d) for the purposes of the processing described above, the data will be communicated by the Data Controller to the West Ligurian Sea System Authority of Savona and the data may be disclosed to the data processing officers formally appointed and instructed by the Data Controller;
- e) the provision of data is required in compliance with the above-mentioned legislative provisions and therefore does not require explicit consent from the interested party. However, the total or partial refusal of the provision of data may make it impossible to issue the authorization of the West Ligurian Sea Authority of Savona for access to the port areas of Savona-Vado;
- f) the data received will be kept for a period of four (4) weeks, after which it will be destroyed.

Your data will not be transferred to non-EU countries.

The parties are granted the rights to access their personal data, to exercise the right to be forgotten under Article. 17 of the GDPR and / or the right to data portability pursuant to art. 20 of the GDPR, to request the rectification, updating and cancellation, if incomplete, erroneous or collected in violation of the law, as well as to oppose their treatment for legitimate reasons, by contacting the companies APM Terminals Vado Ligure S.p.a. and Reefer Terminal S.p.A., Bergeggi (SV), Pier Raffaello Orsero SNC, Porto Vado 17028.

The interested parties also have the right to complain to the Guarantor for the protection of personal data in case of treatment in violation of the contents of the GDPR.

Bergeggi, May 22nd, 2018



The Data Controller
The Managing Director and Proxy Holder
(Paolo Cornetto)

Regulation on the protection of personal data

RIGHTS OF THE INTERESTED PARTY

Section 7 Italian Legislative Decree 196/2003 (Right to access personal data and other rights)

1. The interested party has the right to obtain confirmation of the existence or not of personal data concerning him, even if not yet registered, and their communication in an intelligible form.
2. The interested party has the right to obtain the indication:
 - a) of the origin of personal data;
 - b) of the purposes and methods of the processing;
 - c) of the logic applied in case of treatment carried out with the aid of electronic instruments;
 - d) of the identifying details of the holder, of the responsible and of the designated representative according to article 5, paragraph 2;
 - e) of the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the territory of the State, managers or agents.
3. The interested party has the right to obtain:
 - a) updating, rectification or, when interested, integration of data;
 - b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
 - c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case where such fulfillment is it proves impossible or involves a use of means manifestly disproportionate to the protected right.
4. The interested party has the right to object, in whole or in part:
 - a) per motivi legittimi al trattamento dei dati personali che lo riguardano, ancorché pertinenti allo scopo della raccolta;
 - b) al trattamento dei dati personali che lo riguardano a fini di invio di materiale pubblicitario o di vendita diretta o per il compimento di ricerche di mercato o di comunicazione commerciale.

Section 16 GDPR (Right of rectification)

The data subject has the right to obtain from the data controller the correction of inaccurate personal data concerning him without undue delay. Taking into account the purposes of the processing, the data subject has the right to obtain the integration of incomplete personal data, also by providing an additional declaration.

Section 17 GDPR (Right to cancel - "right to be forgotten")

- 1) The data subject has the right to obtain from the data controller the deletion of personal data concerning him without undue delay and the data controller is obliged to cancel the personal data without undue delay if one of the following reasons:
 - a) personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed;



- b) the data subject revokes the consent on which the processing is based in accordance with Article 6 (1) (a) or Article 9 (2) (a) and whether there is no other legal basis for the processing;
 - c) the data subject opposes the processing pursuant to Article 21 (1) and there is no legitimate overriding reason to proceed with the processing, or opposes the processing pursuant to Article 21 (2);
 - d) personal data have been processed unlawfully;
 - e) personal data must be deleted to fulfil a legal obligation under Union or Member State law to which the controller is subject;
 - f) the personal data have been collected in relation to the information society service offer referred to in Article 8 (1).
- 2) The data controller, if he has made public personal data and is obliged, pursuant to paragraph 1, to delete them, taking into account the available technology and implementation costs, takes reasonable steps, including technical ones, to inform the data controllers that are processing the personal data of the request of the interested party to delete any link, copy or reproduction of his personal data.
- 3) Paragraphs 1 and 2 shall not apply to the extent that treatment is necessary:
- a) for exercising the right to freedom of expression and information;
 - b) for the fulfilment of a legal obligation requiring treatment under Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority of which the data controller is invested;
 - c) for reasons of public interest in the field of public health in accordance with Article 9 (2) (h) and (i) and Article 9 (3);
 - d) for the purposes of archiving in the public interest, for scientific or historical research or for statistical purposes in accordance with Article 89 (1), insofar as the right referred to in paragraph 1 risks making it impossible or to seriously affect the achievement of the objectives of this treatment; or e) for the assessment, exercise or defense of a right in court.

Section 8 GDPR (Right of limitation of treatment)

1. The interested party has the right to obtain from the data controller the limitation of processing when one of the following hypotheses occurs:
 - a) the interested party disputes the accuracy of personal data for the period necessary for the data controller to verify the accuracy of such personal data;
 - b) the processing is illegal and the interested party opposes the cancellation of personal data and asks instead that its use is limited;
 - c) although the data controller no longer needs it for processing purposes, personal data are necessary for the data subject to verify, exercise or defend a right in court;
 - d) the data subject has objected to the processing pursuant to Article 21 (1) pending verification of the possible prevalence of the legitimate grounds of the controller with respect to those of the data subject.
2. If the processing is restricted pursuant to paragraph 1, such personal data shall only be processed, except for storage, with the consent of the data subject or for the establishment, exercise or defense of a right in court or for to protect the rights of another natural or legal person or for reasons of the public interest of the Union or of a Member State.
3. The person concerned who has obtained the processing restriction pursuant to paragraph 1 shall be informed by the controller before the limitation is revoked.

Section 20 GDPR (Right to data portability)

1. The data subject has the right to receive, in a structured, commonly used and automatically readable form, the personal data concerning him / her provided to a data controller and has the



right to transmit such data to another data controller without impediments from part of the data controller to whom he has provided them:

- a) the processing is based on consent pursuant to Article 6 (1) (a) or Article 9 (2) (a) or on a contract within the meaning of Article 6 (1) b); is
 - b) the treatment is carried out by automated means.
2. In exercising its rights relating to the portability of data in accordance with paragraph 1, the data subject shall have the right to obtain direct transmission of personal data from one controller to another, if technically feasible.
 3. The exercise of the right referred to in paragraph 1 of this Article is without prejudice to Article 17. This right does not apply to the treatment necessary for the performance of a task carried out in the public interest or in connection with the exercise of official authority vested the data controller.
 4. The right referred to in paragraph 1 must not affect the rights and freedoms of others.

Section 21 GDPR (Opposition right)

1. The interested party has the right to oppose at any time, for reasons connected with his particular situation, to the processing of his personal data pursuant to Article 6, paragraph 1, letters e) of), including profiling on the basis of these provisions.
2. The data controller refrains from further processing personal data unless he demonstrates the existence of binding legitimate reasons to proceed with the processing that prevail over the interests, rights and freedoms of the data subject or for the assessment, exercise or the defense of a right in court.
3. If personal data are processed for direct marketing purposes, the data subject has the right to object at any time to the processing of personal data concerning him / her for such purposes, including profiling in so far as it is related to such direct marketing.
4. If the data subject objects to processing for direct marketing purposes, personal data are no longer processed for these purposes.
5. The right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the interested party and shall be presented clearly and separately from any other information at the latest at the time of the first communication with the data subject.
6. In the context of the use of information society services and without prejudice to Directive 2002/58 / EC, data subjects may exercise their right to object by automated means using technical specifications.
7. Where personal data are processed for scientific or historical research purposes or for statistical purposes in accordance with Article 89 (1), the data subject shall have the right to object to the processing of personal data for reasons connected with his particular situation concerning him, unless the processing is necessary for the performance of a task in the public interest.

