



## CUSTOMER INFORMATION

*pursuant to Article 13 of the General Data Protection Regulation (EU) 2016/679  
(version July 2023)*

This information is provided pursuant to:

- Article 13 of the GDPR, if you have approached our company directly;
- Article 14 of the GDPR, if your personal data has been communicated to our company by other companies in the Group, agents, intermediaries, or other third parties.

### DATA CONTROLLER

The data controller is Officine Meccaniche Navali e Fonderie San Giorgio del Porto S.p.A. (P.IVA 00348160102) with registered office in Genoa, Calata Boccardo 8, tel. 0039.010.251561, email: [info@sgdp.it](mailto:info@sgdp.it) (hereinafter SGDP), which you can contact through the address indicated or through the email address [privacy@sgdp.it](mailto:privacy@sgdp.it).

The Company is part of Genova Industrie Navali S.p.A. Group, Via dei Pescatori Molo Cagni -16128 Genoa, Italy, which has identified a Data Protection Officer who can be contacted at [dpo.ginholding@privacyinchiario.it](mailto:dpo.ginholding@privacyinchiario.it).

### ORIGIN OF YOUR DATA AND CATEGORIES OF PROCESSED DATA

The data processed are those you provide when you contact us, directly or through third parties, to obtain information, enter into negotiations or establish business relations. The personal data collected are first name, surname, tax code, telephone number, address, email, as well as tax data for the purpose of issuing invoices. We also process images taken by the video surveillance system (see specific notice).

### PURPOSE AND LEGAL BASIS OF PROCESSING

SGDP processes your personal data for the purposes set out below and in accordance with the lawful basis referred to in EU Regulation 679/2016 (GDPR) and Legislative Decree 196/2003 (Privacy Code):

- To respond to specific requests for the provision of services by the customer (GDPR, art. 6, paragraph 1, letter b), and for the related sending of information, quotes or the provision of the requested service;
- For legal obligations to which the data controller is subject (GDPR, art. 6, para. 1, lett. c) By way of example only, for the fulfilment of SGDP's accounting and tax obligations;
- For the pursuit of the legitimate interest of the owner (GDPR, Art. 6, para. 1, lett. f). By way of example only:
  - Combating fraud (prevention without subsequent activities);
  - Esponse to specific requests from competent Authorities;
  - Protection of the company's rights in and out of court;
  - Protection of company assets with access controls;
  - Protection against or processing of incidents in the company area.

SGDP does not carry out any automated processing of your personal data for the purpose of making decisions concerning you.

### COMPULSORY COMMUNICATION OF DATA

Failure, partial or incorrect communication of the data requested at the time of establishing the relationship is mandatory for the provision of the requested service.

### PLACE OF DATA PROCESSING AND PROCESSING METHODS

Your data is processed in the territory of the European Union or in countries permitted by the GDPR. For contractual requirements it may be transferred to third countries outside the European Union, but in that case, it will be appropriately minimised and suitable measures will be taken to ensure its protection. All operations - collection, processing, consultation, printing, storage, modification, updating - may be carried out on paper or by electronic tools.

### COMMUNICATION OF YOUR DATA TO THIRD PARTIES

Your data may be processed on paper and electronically and will not be disclosed in any way, but may be transmitted to the competent figures for administrative or institutional purposes, as required by current legislation. More specifically, the data may be communicated to recipients belonging to the following categories:

- Shareholders and other group companies;
- Information system management companies;

- Consultants, freelancers, credit institutions and banks, lawyers, etc.
- Customers in order to guarantee the interface with them and provide the best possible service;
- External parties delegated to manage and maintain the company's IT systems, including on the cloud, and technical equipment;
- External tax consultants;
- Authorities and public bodies competent by law;
- Banking and insurance institutions;
- Judicial and/or public security authorities in cases expressly provided for by law;
- Other suppliers and subcontractors where necessary for the performance of the service;
- Companies that provide access control services in the spaces used by the company.

Only the minimum personal data necessary to perform the part of the service for which they are responsible will be communicated to these subjects. These subjects, where applicable, will be appointed as Data Processors pursuant to Article 28 GDPR. The list of Data Processors is available upon simple request.

The data may be processed by authorised SGDP personnel who are specially trained and briefed on the subject, on respect for the confidentiality of the data and on the protection of the dignity of all those concerned.

SGDP does not profile the data of its suppliers.

#### **DATA RETENTION PERIOD**

The data collected for purposes a) and b) of the preceding point shall be retained for the period required by law and no longer than 10 years from the end of the fiscal year in which the sale took place.

Data collected for the purpose c) shall be retained for a maximum of 24 months from the collection of the data, without prejudice to other legal terms. In case of protection of the holder's rights, the data will be processed for the time necessary for the statute of limitations to accrue.

#### **YOUR RIGHTS**

You have the right to request and receive, at any time, information regarding your personal data processed by SGDP or to request its rectification. Where applicable, you have the right to request their deletion, to restrict their processing and to receive, in a structured, commonly used and machine-readable format, personal data concerning you. You may address any request regarding your rights directly to SGDP at [privacy@sgdp.it](mailto:privacy@sgdp.it).

You also have the right to object to the processing of your data, in accordance with the provisions of Article 21 GDPR, or to lodge a complaint with the competent Supervisory Authority in accordance with the provisions of Article 77 GDPR.

#### **UPDATES**

SGDP reserves the right to update this policy, with the latest version made available by the company remaining valid.