

# PRIVACY POLICY UNDER THE EU REGULATION 2016/679 (GDPR)

#### 1. Data Controller

This information is provided by Dante Ghirlanda srl, with registered office in Via Ingolstadt, 19 - Marina di Carrara (MS), Italy, in its capacity as Data Controller of personal data (hereinafter referred to as the "Agency").

# 2. Type of data processed

The Agency processes the following categories of personal data:

- Personal and contact data: name, surname, address, telephone, e-mail, tax code or VAT number.
- Business-related data: information necessary for the management of maritime recommendation, customs shipping and logistics services (such as customs documents, goods data, transport documents).
- Accounting and banking data: information necessary for the management of payments and invoices.
  - Browsing data (in the case of use of websites): IP address, access data, cookies.

#### 3. Purpose of the processing

Personal data is processed for the following purposes:

- Management and organization of commercial ship recommendation operations, international shipments and customs.
  - Performance of contractual obligations relating to the services offered.
  - Accounting, tax and administrative management related to the contracts stipulated.
- Compliance with applicable legal and regulatory regulations (including customs, tax, and maritime laws).
- Sending operational and informative communications relating to the services requested.
  - Defence of the Data Controller's rights in court.

# 4. Legal basis for the processing

The processing of data is necessary:

- For the performance of a contract or for the fulfilment of pre-contractual measures at the request of the data subject.
  - For compliance with legal obligations.
- For the legitimate interest of the Data Controller (e.g., to ensure the security of logistics operations or for debt collection).



# 5. Data processing methods and data security

The processing of data will be carried out with electronic and manual tools, in compliance with the security measures provided for by the GDPR, in order to prevent unauthorized access, loss, destruction or alteration of personal data.

# 6. Communication of data

Personal data may be communicated to:

- Customs, tax or other competent public authorities, where required by law.
- Business partners and service providers (e.g., shipping companies, freight forwarders, and couriers).
  - Legal, tax and accounting consultants for needs related to business management.

The data will not be subject to unauthorized dissemination.

#### 7. Data retention

Personal data will be stored for the time necessary to carry out the purposes described in this policy and in any case within the terms provided for by current legislation (for example, for tax or accounting obligations).

### 8. Rights of the interested party

In accordance with the GDPR, data subjects have the right to:

- Access your personal data.
- Request rectification or deletion of data.
- Object to the processing or request its restriction.
- Request data portability.
- Lodge a complaint with the Italian Data Protection Authority.

Requests must be addressed to Dante Ghirlanda srl, at the e-mail address: info@danteghirlandasrl.it.

## 9. Changes to the policy

This policy may be subject to changes or updates, in line with any regulatory or organizational changes. Any updates will be made available at our headquarters and on our website.