

PRIVACY POLICY

As per art. 13, of UE Regulation (GDPR) 2016/679

1. DATA CONTROLLER

Coscos s.r.l., with registered office in Genova, in the person of its pro-tempore legal representative, is the data controller of your personal data ("the Controller" or "Coscos s.r.l.") voluntarily disclosed (verbally, through business card, via email, through the web site www.coscos.com) hereby gives to you this circular as per art 13, GDPR (in short, "Circular").

2. PURPOSE OF THE PROCESSING OF PERSONAL DATA

Your personal data will be processed (pursuant to article 6, letters b, e, f, GDPR), for the following purposes:

- manage contacts between the parties and respond to any possible request received as part of the conduct of professional and commercial relationships,
- fulfill the pre-contractual and contractual obligations deriving from the conferment of a possible contractual relationship between the parties,
- comply with laws and regulations (Italian or EU), or execute an order of judicial authorities or supervisory bodies to which the Controller is subject,
- exercise the rights of the data controller, in particular, that of defense in court.

The provision of data for the purposes referred to in the previous section is considered implicit and mandatory. The lack of data and / or the possible express refusal to treatment will make it impossible for the Data Controller to perform the assigned task or the possible violation of requests by the competent Authorities.

3. CATEGORIES OF PERSONAL DATA PROCESSED

In the area of the purposes for the processing of data highlighted in the previous paragraph (2), only personal data will be processed concerning, for example, name and surname, tax code, VAT number, residence, domicile, place of work, e-mail or PEC address, telephone and fax number, employer company, role and / or company position, etc.

4. BENEFICIARIES OF PERSONAL DATA

For the purposes indicated at previous para, the personal data supplied by you will be made accessible to:

- a) The employees and the staff of the Data Controller, in their quality of workers authorized in the handling of personal data (so-called personal data processing staff),
- b) The external companies and/or subsidiaries and affiliates with offices in the territory of the European Economic Area (EEA) offering to the Data Controller outsourcing services, like IT

services, administrative and accounting services and the external consultants who will handle your personal data in their quality of Data Processors.

- e) The parties to whom the communication is due by virtue of legal obligations, like the Public Administration, and Competent Authorities in Italy and abroad.

The list of Data Processors is updated at care of the Privacy Area Manager and it is available for the consultation e/o him.

Furthermore, the Data Controller will be allowed to process your data. No mean of release of your data is forecasted against unspecified parties.

5. PROCESSING OF DATA TOWARDS COUNTRIES NOT BELONGING TO THE EUROPEAN ECONOMIC AREA

Furthermore, to achieve the aforementioned purposes, your data may be transferred to companies belonging to the corporate group of which the Data Controller is a part or to third parties located outside the European Economic Area offering services related to the management of the contract with VS SOCIETA' or to whom the transfer of your data becomes necessary as part of the performance of the aforementioned relationship.

This transfer, where the case occurs, will be regulated, depending on the recipients, through the use of standard contractual clauses adopted by the European Commission or, alternatively, on the basis of an adequacy decision by the Commission and / or any other instrument allowed by the reference legislation including, where the case occurs, the use of binding corporate rules in the context of intra-group transfers.

You can get the information about the location where your data have been transferred, by sending a message to info@coscos.com

6. DATA DETENTION PERIOD

The data related to your person will be processed by COSCOS s.r.l. for the duration of any professional relationship established and will be kept for a period of 11 years after the termination of said relationship, exclusively for purposes related to the fulfillment of legal obligations or the defense of rights of COSCOS s.r.l. in court.

7. YOUR RIGHTS IN QUALITY OF PERSON CONCERNED BY THE TREATMENT

During the period in which COSCOS s.r.l. is in possession of or processing your data, you, as person concerned by the treatment, may, at any time, exercise the following rights:

- Right of access - You have the right to get confirmation about the existence or otherwise of a treatment concerning your personal data, as well as the right to receive any information relating to the same treatment;

- Right to rectification - You have the right to obtain the correction of your personal data in our possession, if they are incomplete or inaccurate;
- Right to cancellation - in certain circumstances, you have the right to obtain the deletion of your personal data in our archives if they are not relevant for the purpose of the continuation of the employment relationship or required by law;
- Right to limitation of treatment - upon the occurrence of certain conditions, you have the right to obtain the limitation of processing concerning your personal data, if it is not relevant for the continuation of the employment relationship or necessary by law;
- Right to portability - You have the right to obtain the transfer of your personal data in our possession in favor of a different Data Controller;
- Right to object - You have the right to object, at any time for reasons connected with your particular situation, to the processing of your personal data by the Data Controller on the basis of your legitimate interest or the performance of a task in the public interest or the exercise of public powers, including profiling, unless there are legitimate reasons for the Data Controller to continue processing that prevail over the interests, rights and freedoms of the person concerned by the treatment or for the assessment, exercise or defense of a right in court;
- Right of withdrawal of consent - You have the right to withdraw your consent to the processing of your personal data at any time, subject to the lawfulness of the processing based on consent before revocation;
- Right to propose a complaint to the Supervisory Authority - in the event that Fratelli Cosulich S.p.A. refuse to satisfy your requests for access and / or exercise of the rights referred to above, the reasons for the relative refusal will be given. If applicable, you have the right to lodge a complaint as described in the following paragraph.

Those requests may be addressed to Fratelli Cosulich S.p.A., only to the following email address

8. PROCESSING METHODS

The treatment of your personal data is made by means of the operations indicated at item 4, n.2, GDOR - performed with or without the aid of computer systems - namely: collection, registration, organization, structuring, updating, storage, adaptation or modification, extraction and analysis, consultation, use, communication by transmission, comparison, interconnection, limitation, cancellation or destruction.

In any case, the logical and physical security of the data and, in general, the confidentiality of the personal data processed will be guaranteed, putting in place all the necessary technical and organizational measures able to guarantee their security.