

## **PRIVACY POLICY**

INFORMATION CONCERNING THE PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH ART.13 OF LEGISLATIVE DECREE N. 196 OF JUNE 30<sup>th</sup> 2003 AND SUBSEQUENT ARTICLES N. 13 AND 14 OF EUROPEAN DIRECTIVE N. 2016/679 OF APRIL 27<sup>th</sup> 2016

In accordance with Article n.13 of Legislative Decree n. 196 ("Regulation about the protection of personal data" – hereinafter referred as to "Privacy Policy"), as well as with Articles n. 13 and 14 of European Regulation n. 2016/679 of April 27<sup>th</sup> 2016 ("General Regulation about data protection – hereinafter referred as to "GDPR"), WORLD YACHTS S.R.L. (with Headquarters in G.Carducci 8, 50053 Empoli (FI) – VAT n.06169570485 – hereinafter referred as to "The Controller") hereby supplies a full information about the way personal data will be processed according to principles of correctness, lawfulness, transparency, and ensures the protection of your privacy and your rights. Here below you can find the terms and methods of data collection and processing:

### **1. Subject of processing**

The Controller will process common personal identification data (such as name, surname, company name, address, telephone number, e-mail address, bank and payment details – hereinafter referred as to "personal data" or also "data") that will be supplied at the beginning of contractual relationship.

### **2. Legal framework of processing**

Your data will be processed according to Article 6 l° paragraph, and in detail:

- letter b) – that is, for the execution of a contract you are a part of or for the execution of pre-contractual measures taken at your request;
- letter c) – that is, for the fulfilment of a legal obligation to which the Controller is subject;
- letter f) – that is, for the pursuit of a legitimate interest of the Controller.

### **3. Purpose of processing**

Your data will be processed for the following purposes:

- correct execution of the contracts and services contained therein;
- fulfilment of legal obligations, including tax, accounting and administrative ones, also including legal obligations towards the Financial Administration (for example, regarding invoice issue or compliance with anti-money laundering regulation);
- management of relationships with banks;
- exercise of a legal right or claim;
- internal purposes such as statistical indicators, customer satisfaction and the effectiveness of the business management with customers and suppliers, related to the execution of the contract.

#### **4. Processing methods**

The data processing is carried out, in compliance with the aforementioned purposes and in accordance with the provisions of art.4 of Privacy Law and n.2 of the Policy, through the use of tools and procedures suitable for guaranteeing security and confidentiality, either by paper documents, or through the use of IT and electronic tools, by the Controller and/or employees and/or collaborators of Data Controller. The treatment includes:

- a) collection of personal data,
- b) organization and storage of Data received, necessary for the completion of the intervention
- c) registration and updating and organization of Data base, either electronic or on paper;
- d) consultation of personal Data,
- e) Data processing to allow the fulfilment of the above purposes,
- f) Interconnection and/or comparison,
- g) deletion and destruction of data.

The operations referred to in points b), c), d), e) and f) will be put in place, for the correct pursuit of the purposes, also by the persons appointed as data controllers.

#### **5. Safety**

The processing of your personal data will be in compliance with the law, through the use of tools and procedures including IT and electronic, suitable to ensure security and confidentiality, to prevent both access to unauthorized persons and treatment not in accordance with the purposes, and to promptly restore the availability and access to data in the event of a physical or technical incident.

Data Controller may use specifically authorized persons to prepare all the aforementioned measures.

#### **6. Access and communication of data**

Your data may be communicated, in compliance with the Regulations and the relevant legislation and the Policy:

- to employees and collaborators of Data Controller, specifically authorized;
- to third-party companies or other subjects (as an indication, credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, etc.), who carry out outsourcing activities on behalf of the Controller, acting as external data;
- to subjects that can access the data pursuant to law disposition, regulation or EU law, within the limits foreseen by these rules;
- to other subjects to which they must be disclosed by law.

#### **7. Data storage**

Your data will be stored, both in paper form (archive) and on digital media, at the company headquarters and/or in "Cloud storage".

For the fulfilment of the above mentioned purposes, your data will be stored in compliance with the laws in force also by the appointed data processors.

## **8. Data retention period and procedures for revocation and renewal of consent storage**

The data provided will be stored in the archives of Data Controller according to the following parameters:

1. for the administration, accounting and management of any litigation: 10 years from the termination of the professional relationship, as established by law from the provisions of art.2220 C.C
2. for the internal purposes and management of the archive, until the contract is terminated or the consent is revoked, according to the procedures indicated afterwards;
3. for the promotion of services, for 5 years or at the time of revocation of consent or expiry or termination of the contract;
4. for the exercise of warranties on the products purchased and/or the services provided: for the period prescribed by law, depending on the product or service provided.

With reference to the hypothesis sub.1, at the end of the tenth year the Data Controller will delete or destroy the documentation containing your personal data no longer necessary for the pursuit of the purposes indicated above or, following your request to be submitted within 30 days prior to this deadline, to return it to you. The documentation that is strictly necessary to Data Controller for the fulfilment of the purposes indicated will be kept in paper and/or digital format at the archives for the same period and according to the same parameters. At the time of termination of the relationship, the documentation will be returned to the holder or, once the retention period ends, the same will be transmitted to be cancelled or destroyed, unless the interested party - in the aforementioned term - opts for his redelivery.

As concerns the hypotheses sub.2 and 3, the interested party can revoke the consent by sending the text message "no consent" to the email address below.

## **9. Data transfer abroad**

The management and storage of personal data will take place within the European Union territory.

## **10. Rights of person concerned**

As person concerned, according to Articles n. 7 et seq. of Privacy Regulation and Articles n. 15 – 22 of GDPR, by contacting the Data Controller you have the right to information and indications about:

- the existence of an on-going processing of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
- the origin and the categories of personal data ;
- the purposes and processing methods;
- the provided period of personal data storage;
- the existence of an automated decision-making process (including profiling);
- the logic applied in case of a processing carried out with the aid of electronic instruments;
- the subjects or the categories of subjects to whom the personal data can be communicated;
- the subjects or categories of subjects who may become aware of personal data as appointed representative in the State territory, as managers or persons in charge;
- the identification details of the Controller, or the managers, designated representatives and persons in charge, where appointed;

- in case personal data are transferred to a third country or to an international organization, information on the existence of adequate guarantees pursuant to Article 46 of the EU Regulation.

You also have the right to:

- obtain the updating, correction or, if required, integration of;
- obtain the deletion, limitation, transformation into anonymous form or blocking of data processed in violation of the law, including those for which storage is not necessary in relation to the purposes for which data were collected or subsequently processed;
- ask for data portability, in compliance with the provisions of Article n. 20 of EU Regulation;
- request a copy of the personal data being processed.

Where applicable, you also have the rights referred to in Articles n. 16-21 of GDPR:

- right of amendment;
- right to be forgotten;
- right to limitation of processing;
- right to data portability;
- right of opposition;
- propose a complaint to the Italian Data Protection Authority, to obtain the protection of your rights, following the procedures and indications published on the official website of the Italian Data Protection Authority: [www.garanteprivacy.it](http://www.garanteprivacy.it). The exercise of the right is not subject to any form constraint and it is free.

### **11. Procedure to exercise your rights**

You can exercise your rights at any time by sending a communication:

1. via e-mail to: [g.cecchi@worldyachts.it](mailto:g.cecchi@worldyachts.it)

### **12. Changes to this data protection information**

In case of substantial changes to the ways your data are processed, you will be promptly informed of these changes.

### **13. Identification of Data Controller, Manager and communication channels**

The Data Controller is: individual company World Yachts Srl, Via G. Carducci, 8 – 50053 Empoli (FI) – Italy.

The documents of Controllers appointment, of the internal authorized subjects and any other information regarding your data can be provided to you by your written request to be sent to the e-mail address: [g.cecchi@worldyachts.it](mailto:g.cecchi@worldyachts.it)