



## Personal Data Protection Compliance Statement

360 Payment Solutions S.p.A., with registered offices at via Quintino Sella 3, 20121 Milan, Italy, and administrative headquarters at via Genesisio Bressani 4, 29017 Fiorenzuola D'Arda (PC), Italy, with Taxpayer Identification Code 00685080426 and VAT Code 13091510159 (hereinafter, "Data Controller"), wishes to inform you that the personal data you have voluntarily made available to the Data Controller shall be processed in compliance with Regulation EU No. 2016/679 (hereinafter, "GDPR").

The Data Controller therefore invites you to carefully read the new compliance statement on the protection of your personal data, provided in accordance with Article 13 and in the manner provided for in Article 12 (*in a concise, transparent, intelligible and easily accessible form, using clear and plain language*) of the GDPR.

### 1. Data Subject to Processing

The data we ask you to provide within the scope of business agreements, are collected for the purpose of offering an accurate and effective operative management of the services provided by our Company within the scope of maritime transport.

The Data Controller processes the personal data you will provide when subscribing to the 360 Payment Solutions services for purposes connected to the management of the contractual relationship, and to discharge accounting, fiscal, or legal obligations.

The personal data (hereinafter, the "Data") communicated by the Data Subject to the Data Controller fall within the following category:

Personal and Contact Details - Information on the Name, Place, and Date of Birth; Taxpayer Identification Code; Email Address; Place of Residence, and Phone Number.

### 2. Purposes and Legal Grounds for Processing

Your data shall be processed:

A) in compliance with Article 6, letter b), and e) of the GDPR, for the following Service Purposes:

- Managing your subscription to the 360 Payment Solutions services, so that you may use all the services you should request;
- Implement economic, communication, or commercial initiatives deemed compliant with the Company's business purpose as stated in its bylaws;
- Discharge administrative - accounting obligations and any obligation of law or regulation, including European Community regulations, or orders issued by the Authorities;
- Exercise the rights of the Data Controller, including in legal proceedings;
- Communicate news and information to our providers on the contractual and business relationships in place, in order to provide our services without any discontinuity in terms of operations;

- Provide operative assistance to customers, including post-sale;

B) After you have provided your express and separate consent, acquired pursuant to Article 7 of the GDPR, for the following Purposes:

- Sending you, via ordinary e-mail or via phone, informative and commercial communications, including promotional material, which may be sent in the form of newsletters;
- Profiling activities that enable the development and completion of statistical and market research and surveys, for the purpose of analysing consumer choices and needs, and for you to receive personalised offers based on your purchase preferences, as well as e-mails containing customer satisfaction and opinion polls;
- Registration with initiatives created by the Data Controller, such as, by way of example, trade fairs and events that may be relevant to your business.

The legal grounds for such processing fall within those listed under Article 6 of the GDPR, including: performance of contractual and pre-contractual obligations, legal obligations, and consent of the Data Subject.

### **3. Nature of the Provision of Data and Consequences for Refusing to Provide Certain Data**

The provision of the data required to pursue the purposes as per heading A), paragraph 2, is “mandatory”, and, where you should refuse to provide such data, 360 Payment Solutions shall be unable to provide the services, or to inform you on any variations to the service selected.

The provision of the data required to pursue the purposes as per heading B), paragraph 2, is “optional”, meaning that a refusal to provide such data shall exclusively entail that you may not be informed of new services/commercial initiatives. You may also decide to freely revoke the consent granted by communicating your intention revoke such consent through the email address [marketing@360-paymentsolutions.com](mailto:marketing@360-paymentsolutions.com), it being understood that the legality of the processing performed based on the consent granted prior to such revocation shall not be affected. In any case, revoking your consent to the processing of the optional data you have provided shall not affect the purposes for which you have provided the mandatory data.

### **4. Methods and Duration of the Processing**

The Data are processed in paper, electronic, and/or computer form for the time that is strictly required to attain the purposes for which they were collected, and for the purpose of any legal obligation (or, where applicable, up until the Data Subject submits a request for their erasure or revokes their consent to the processing thereof).

The processing of your Data is performed through the operations indicated under Article 4, No. 2, of the GDPR, meaning any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### **5. Security**

In consideration of the nature, the subject matter, and the purposes of the processing of personal data, the Data Controller and the Data Processor implement technical and organisational measures that are suitable to guarantee a level of security against the risk of loss, dissemination, abuse, or alteration of Data, including:

- a) Pseudonymisation and encryption of personal data;
- b) Capacity to ensure, on a permanent basis, the confidentiality, integrity, availability, and resilience of the processing services and systems;
- c) Capacity to promptly restore the availability and access to the personal data in case of physical or technical incident;
- d) A procedure to regularly test, check, and assess the effectiveness of the technical and organisational measures implemented to guarantee the security of the processing.

## **6. Scope of the Disclosure of Data**

Please note that the Data you have provided or acquired over the course of the performance of the agreement may be made accessible for the purposes detailed under paragraphs 2.A and 2.B:

- a) to employees and collaborators of the Data Controller, in their capacity as persons in charge of the processing and/or internal processors and/or system administrators;
- b) to third-party companies that perform outsourced activities on behalf of the Data Controller in their capacity as external processors, and, thus, to external professionals whose legal, fiscal, or accounting services are requested by the Company, or to banks and credit institutions, to companies that provide services or companies within the 360 Payment Solutions S.p.A. Group and other companies affiliated thereto; the transfer of your Data to countries outside the EU, usually between Group companies, other than in the cases when such transfer is guaranteed by Decisions of Suitability of the Committee, is carried out in a manner such as to provide suitable and opportune guarantees under Articles 46 or 47 or 48 of the Regulation.

## **7. Rights of Data Subjects**

In your capacity as Data Subject, you may freely exercise the rights detailed under Article 15 of the GDPR, which are:

- obtain from the controller confirmation on the existence of personal data that concern you, including when not yet recorded, and obtain the communication thereof in intelligible form;
- obtain the indication of : a) the source of the personal data: b) the purposes and the methods of processing; c) the logic applied in case of processing carried out through electronic tools; d) the identification data of the Controller, the Processors, and the supervisor appointed under Article 3, paragraph 1, of the GDPR; e) the recipients or the categories of recipients to whom the personal data may be disclosed or who may learn of such data in their capacity as appointed representatives in the territory of the State, or as Processors or persons in charge of processing;
- obtain: a) the updating, rectification, or, where of interest, the completion of incomplete Data; b) the erasure, anonymisation, or blocking of the data that was processed in violation of the law, including the data which storage is not required with respect to the purposes for which the data was collected or subsequently processed; c) a statement that the operations as per letters a) and b) have been brought to the attention of, including with respect to their content, to those to whom the data were communicated or disclosed;
- object, in whole or in part, a) on legitimate grounds, to the processing of personal data that concern you, including where pertinent to the purpose for which they were collected; b) to the processing of the personal data that concern you for the purpose of sending advertisement material or direct sale or to perform market

surveys or for the purpose of marketing communication, via e-mail and/or traditional marketing techniques such as phones and/or traditional mail. Where applicable, you shall also have the rights listed under Articles 16-21 of the GDPR (Right to rectification, Right to be forgotten, Right to restriction of processing, Right to data portability, Right to object), and the right to submit complaints to the Supervisory Authority.

## **8. How to Exercise Your Rights**

You can exercise the rights as per paragraph 7 above at any time, by writing to [legal@transferry.com](mailto:legal@transferry.com).

## **9. Data Controller and Data Processors**

Our contact details are:

360 Payment Solutions S.p.A., Data Controller, may be contacted at Via Genesio Bressani 4/C, 29017 Fiorenzuola d'Arda PC, Italy.

The Data Subjects may also request, at any time, and without any formalities, to receive the list of the third-party recipients who may have access to the Data in their capacity as external processors or independent data controllers.