

INFORMATION FOR CLIENTS AND POTENTIAL CLIENTS

Pursuant to Reg. EU/2016/679

Data controller is the company AMICO & CO srl, with its headquarters in Genoa, Via dei Pescatori – CAP 16128, Tel. +39 010-2470067, e-mail: privacy@amicoshipyard.com, Vat number IT03249970108, in the person of the legal representative *p.t.* (“**Data controller**” or “**Company**”)
Web site: <https://amicoshipyard.com/>

In order to respect the principle of transparency, we are providing the following information to ensure that you are informed as regards the ways and characteristics that we use when processing your personal data:

Who we are and which data we process

AMICO & CO srl operates in the large yacht maintenance, repair and refit sector and as a Data Controller guarantees you maximum confidentiality when processing your personal data, its accuracy and its updating, exactly as laid down by current regulations on personal data processing.

Object of the processing

With regard to clients who are physical persons, the Data controller processes personal data (for example name, surname, street address, province and town of residence, home and/or mobile number, fax number, tax number, vat number, company name, personal email address, bank and payment details eg. IBAN), (hereafter referred to as “**personal data**”), communicated by you when stipulating contracts for the services and/or products that we offer and/or for marketing objectives. As regards legal entity clients, the Data Controller processes the personal data of your employees, collaborators, legal representatives or attorneys necessary for managing the commercial relationship or for signing contracts (“contractual data” or “contact data”) which, as far as this information is concerned, is also considered to be “**personal data**”. The persons to whom the personal data refer are the “**Data Subject**”.

Why and on what legal basis do we process your data

Personal data is necessary to AMICO & CO srl in order to follow through with registration requests, to manage and carry out contact requests forwarded by the client, provide assistance and to comply with the legal and regulatory obligations by which the Data Controller is bound, depending on the activity that it carries out. Under no circumstances does AMICO & CO srl use your personal data for undeclared purposes.

In particular, your data will be processed for the following purposes:

a) For registration and for contact and/or information requests

The processing of your personal data occurs to allow preliminary and follow-up activities after a registration request for our services, also on line, to manage information requests and/or for sending brochures, as well as for complying to any other obligations deriving therein.

The legal basis of this processing consists in the legitimate interest of the Company in providing the benefits relating to your registration, information and contact request and/or for sending informative material or complying with contractual or pre-contractual services.

b) For managing the contractual relationship

Processing occurs to enable the preliminary or consequent activities needed for purchasing one of our services or products, for managing an order, for providing the same service, for relative invoicing and managing payment, as well as for complying to any other obligations deriving from the contract, fulfilling the obligations laid down by law, by regulations, by EU rules or by any orders by the Authorities (for example, on anti-money laundering), or in order to exercise the rights of the Data Controller (for example the right of defence in court).

The legal basis of such processing is the legitimate interest of the Company in correctly managing the contractual relationship with its clients or performing services regarding the contractual relationship and respecting law obligations.

c) For promotional activities.

AMICO & CO srl, even without explicit consent pursuant to article 130 of the Italian Data Protection Code (*cf.* Law Decree 30th June 2003, n. 196), can use the contact data communicated by the Concerned/Client, for the purpose of direct marketing communication purposes for its own services and products, unless the Concerned/Client does not explicitly oppose.

The legal basis is the legitimate interest of the Data Controller to offer similar services and products to those already sold (if you are a Client of the Company) or, otherwise, your consent.

As far as potential clients are concerned, AMICO & CO srl can process the data with the purpose of sending promotional communications only with prior consent. To this end, should you be interested in receiving our promotional material, tick the appropriate box at the bottom of this information.

Mandatory or optional nature of the provision of data and consequences of any refusal to provide data

Gathering and processing of personal data as cited in sub a) and b) of the previous point is necessary to fulfil the service requests. Should you not wish to provide your personal data expressly provided for as necessary, AMICO & CO srl will not be able to fulfil the processing linked to the management of the services requested and/or the contract, nor the obligations that derive therein.

Conferment of personal data for the purposes cited in sub c) of the previous point is optional and, in any moment, you can exercise your right to oppose its use or revoke your consent, without this prejudicing the proper execution of the contractually agreed services.

For how long is my personal data kept?

Your personal data is kept for the amount of time provided for by the applicable law, and at any rate for an amount of time no longer than that necessary for fulfilling the purposes indicated above, and, specifically relating to the performance of the contract, for a period of ten years from the final act of performing the contract, also for the purposes of conserving invoicing data. At the end of this period, data is destroyed with secure erasing methods, like wiping and shredding.

In the case of data processed for marketing/promotional communications purposes, this will continue to be processed until you request to unsubscribe from the promotional communications service/newsletter delivery, apart from the real transformation into anonymous form which does not allow identification of the persons concerned, even indirectly or by connecting other databases.

When you make a deletion request, the data will be automatically deleted (pursuant to the applicable regulation), or made anonymous so as to not permit identification of the persons concerned, even indirectly or by connecting other databases.

At any rate, should you oppose data processing, your data will be deleted within 30 days of the request.

Should you need to forward to AMICO & CO srl personal data that is unrequested or unnecessary for the purposes of performing the service requested, AMICO & CO srl will not be considered to be the controller of this data and will proceed with deleting it in the shortest time possible.

Who are the recipients and/or categories of recipients of your personal data?

Your personal data will not be disclosed and may be known, to the extent necessary and for the purposes indicated, by employees and collaborators of AMICO & CO srl, authorized pursuant to Art. 29 of the Code; furthermore it can be communicated to third parties, as independent or joint data controllers, or as External Data Processors pursuant to Article 28 of GDPR, with an appointment contract, that contains the methods of processing and the security measures to be taken by them for the management and conservation of personal data for which the Company is Data Controller, such as:

- External entities, even private ones, inspectors of various types;
- Previously appointed external consultants;

Furthermore, data could be transmitted to the Security Authorities and the Judicial Authorities if necessary.

The complete list of the subjects to whom your personal data has been or could be communicated is at your disposal, at your request, to be made using the contact details at the start of this document. Your data will not be transferred to another country or to an international organisation.

Which are your data rights?

As a Data Subject, you have the right at any moment to exercise your rights regarding GDPR. Requests should be sent to: AMICO & CO srl, with its headquarters in Genoa, in Via dei Pescatori – CAP 16128 or by e-mail: privacy@amicoshipyard.com, telephone: +39 010-2470067

In particular, you have the right to obtain from the Data Controller:

1. Confirmation that your personal data concerning is being processed and in such a case, obtain access to personal data and related information (art. 15);
2. Rectification and deletion of data (art. 16 and 17);
3. Limitation of data (art. 18);
4. Certification that the operations referred to in points 2) and 3) above have been brought to the attention of those to whom the data has been communicated, provided that this is not impossible or involves a disproportionate use of means (art. 19);

The Data Subject may also exercise, under the conditions specified in the GDPR:

5. the right to data portability (art. 20);
6. the right to object (art. 21);
7. the right to object to automated decision-making relating to natural persons, including profiling (art. 22);
8. the right to withdraw your consent at any time (if the processing is based on consent) (art. 7);
9. without prejudice to any other administrative or judicial action, the right to lodge a complaint with the competent supervisory authority for the protection of personal data for any breach you consider to have suffered, which for Italy is the **Garantor for the protection of personal data**. The complaint may be lodged by following instructions found on www.garanteprivacy.it, or alternatively by post, sending it to the *Garante per la Protezione dei Dati Personali*, which has its headquarters in Rome (Italy), Piazza Venezia n. 11 – Cap 00187.

CONSENT FOR DATA PROCESSING

The undersigned _____ declares to have read the above information and gives his/her consent to the processing of data collected for the sending of promotional material/ invitations to events.

by email/sms/Whatsapp,

by ordinary mail

Legible signature _____

Place _____ Date _____