

WWW.OCEANICA-PLATE.COM PRIVACY DISCLAIMER

1. Data controller

Lost Time srl with registered office in via Monsignor Rinaldi, 4, Cornegliano Laudense (Lodi), Italy, Tax Code and VAT no. 09404670961, hereinafter referred to as "Data Controller", guarantees compliance with the regulations on the protection of personal data by providing the following information on the processing of data pursuant to Art. 13, EU Regulation 2016/679 (General Data Protection Regulation - GDPR) and subsequent amendments.

2. Data processed, purposes and legal bases of the processing

2.1. Data generated by access to the site

During their normal operation, the computer systems and software procedures used to operate this website acquire certain personal data in an automated way, the transmission of which is implicit in the use of internet communication protocols.

The information collected could include the following:

- Domain names
- Internet Protocol (IP) address
- Operating system used
- Type of browser and device parameters utilised to connect to the Website
- The Web page that referred the origin and exit of the visitor (referral)

The information listed here are processed automatically and collected in an exclusively aggregated form in order to verify the correct functioning of the Website, and for security reasons.

The legal basis for data processing is the legitimate interest of the Data Controller.

2.2. Data recorded for security purposes

As a security measure (anti-spam filters, firewalls, and virus detection), the data automatically stored may also include personal data such as the IP address. Such data may be used to block attempts to hack the Website or other users, or any other harmful or illegal activity, and is handled according to the laws governing data usage and storage. These data are never used for the identification or profiling of the user, but only for the purpose of protecting the Website and its users.

The legal basis for data processing is the legitimate interest of the Data Controller.

2.3. Data submitted voluntarily by users

The personal data provided by the user through the form are collected and processed for the following purposes: a. for carrying out customer relationship activities based on contractual and/or pre-contractual agreements b. for administrative purposes and for the fulfilment of legal obligations such as those of accounting, tax, or to comply with requests from the judicial authority

c. in the case of sending a Curriculum Vitae, exclusively for selection purposes

The legal basis for the data processing is the performance of a contract to which the Data Subject is party or the performance of pre-contractual measures adopted at the request of the Data Subject.



3. Nature of data provision

Apart from what has been specified for navigation data (point 2.1 and point 2.2), the provision of data, with respect to the purposes referred to in point 2.3, is optional, but any refusal will make it impossible for the Data Controller to implement the contractual or pre-contractual commitments undertaken.

4. Places and methods of data processing and retention times

The data collected by this Website is processed at the headquarters of the Data Controller and at the web hosting datacenter (AWS), regularly indicated as Data Processor.

The data collected will be processed by electronic or automated, computerized and telematic means, or by manual processing with logic strictly related to the purposes for which the personal data were collected and, in any case, in order to ensure the security of the same.

The data are kept for the time strictly necessary to manage the purposes for which the data are processed ("conservation limitation principle", Art.5, EU Regulation 2016/679) or in compliance with the deadlines provided for by current regulations and legal obligations.

Periodic verification of the obsolescence of stored data is performed in relation to the purposes for which it was collected.

The data collected by navigation, used for security purposes, are stored for 5 years. In any case, the Data Controller practices rules that prevent the retention of data for an indefinite period of time and therefore limits the retention time in compliance with the principle of minimising data processing.

Information about GDPR compliance of AWS: https://aws.amazon.com/it/compliance/gdpr-center/

5. Subjects authorised to process data, data processors and communication of data

The processing of the collected data is carried out by internal personnel of the Data Controller, for this purpose identified and authorised for the processing, according to specific instructions given in compliance with current legislation.

The data collected, within the limits pertinent to the processing purposes indicated and if necessary or instrumental to the execution of the same purposes, may be processed by third parties appointed as External Data Processors, or, as the case may be, communicated to them as independent Data Controllers, namely:

- companies belonging to our corporate group for the purposes set out in point 2.3 letters a), b) and c)
- people, companies, associations or professional firms that aid and advice to our Company, for the purposes set out in point 2.3 letter b) and c)
- companies, organizations, associations that provide services related and instrumental to the execution of the above-mentioned purposes (analysis and market research service, credit card payment management, maintenance of computer systems)

The data collected may be provided in case of legitimate request, only in the cases provided for by law, by the Judicial Authority. Your personal data will in no case and for no reason whatsoever be disclosed.

The Data Processors and Persons in Charge of the processing in office are identified in the Privacy Document, which is updated on a regular basis.



6. Transfer of Data to Non-EU Countries

The data collected may also be transferred abroad, even outside the European Union in the forms and ways provided for by current legislation, ensuring, in any case, an adequate level of protection.

This Website may share some of the data collected with services located outside the European Union. Specifically, with Google (also YouTube), Facebook (Facebook and Instagram) and Microsoft (LinkedIn) through social plugins and Google Analytics and Google Search Console services.

The transfer is authorised on the basis of specific <u>decisions of the European Union and the Italian Data Protection Authority</u>, for which no further consent is required.

The companies mentioned above provide adequate guarantees that allow the transfer.

You can find information about data usage and GDPR compliance at the following links:

- Google (including YouTube) here
- Facebook <u>here</u>
- Instagram here
- Linkedin here and here
- Google Analytics here and here

7. Rights of the Data Subject

In relation to the Personal Data communicated, the Data Subject has the chance to exercise the following rights:

- a. (Art. 7.3 EU Regulation 679/2016 GDPR) withdrawal of consent
- b. (Art. 15 EU Regulation 679/2016 GDPR) access and request a copy
- c. (Art. 16 EU Regulation 679/2016 GDPR) request correction
- d. (Art. 17 EU Regulation 679/2016 GDPR) request cancellation ("right to be forgotten")
- e. (Art. 18 EU Regulation 679/2016 GDPR) obtain the limitation of processing
- f. (Art. 20 EU Regulation 679/2016 GDPR) receive them in a structured, commonly used and machine-readable format for the purpose of exercising the right to portability
- g. (Art. 21 EU Regulation 679/2016 GDPR) oppose the processing

The Data Subject may exercise his or her rights, as well as request further information regarding his or her Personal Data, by sending an e-mail to <u>oceanica@oceanica-plate.com</u> specifying in the subject line the content of his or her request.

Requests relating to the exercise of the user's rights will be processed without undue delay and, in any case, within one month of the request; only in cases of particular complexity and according to the number of requests may this period be extended by a further 2 (two) months.

We remind you that it is the right of the Data Subject (Art. 77 EU Regulation 679/2016 - GDPR) to lodge a complaint with the Data Protection Authority, located in Rome, via di Monte Citorio, 121, Italy. Tel. +39 06 696771 - E-mail: garante@gpdp.it

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