# Sea Vision S.r.l.

Via Treves 9E 27100 Pavia (PV)
27100 Pavia (PV)
P.IVA 01638840189
PEC: info@pec.seavision.it


## Privacy Policy concerning the processing of personal data pursuant to articles 13-14 of (EU) Regulation 2016/679

### Data subject: Reference persons at client companies.

Sea Vision S.r.l. in its capacity of Data Controller with regard to the processing of your personal data pursuant to (EU) Reg. 2016/679 (hereinafter the 'GDPR'), hereby informs you that the said regulation protects data subjects with regard to the processing of their personal data and that the said processing will take place in a fair, lawful, transparent manner which protects your privacy and your rights.

Your personal data will be processed in accordance with the terms of the above legal provisions and the confidentiality obligations contained therein.

Purposes and legal basis of processing: specifically, your data will be processed for the following purposes, relating to the fulfilment of legal obligations:

- Accounting or treasury;
- legal compliance with regard to taxation and accounting;
- Current legal requirements.

Your data will also be processed for the following purposes relative to the performance of measures connected to contractual or preliminary obligations:

- After sales support;
- Historical filing system of customer invoices;
- Clients management;
- Electronic payment instruments;
- Report management during sales operations;
- Detection of the degree of customer satisfaction;
- Quality Management;
- Activities schedule.

For the purposes of the aforesaid processing, the Data Controller may obtain knowledge of special categories of data, as follows: Particular personal data. Personal data in these special categories are processed in compliance with art. 9 of the GDPR.

Further to your consent, your personal data may be used for the following purposes:

- Marketing and Advertising.

Your contribution of data is optional with regard to the abovementioned purpose, and any refusal of consent will not affect the continuation of the relationship or the congruency of the processing.

Processing procedures. Your personal data may be processed by the following ways:

- Manual personal data processing with paper filing system;
- contract data processing by third parties;
- computer processing.

All data are processed in compliance with the procedures specified in articles 6 and 32 of the GDPR and with the adoption of the appropriate security measures required.

Your data will only be processed by persons specifically authorised by the Data Controller, and specifically by the following categories of authorized persons:

- Admnistration office;
- Marketing office.

Disclosure. Your data may be disclosed to external entities for the correct management of the relationship and specifically for the following categories of Recipients, including all the duly designated Data Processors:

- banks and lenders;
- consultant and freelance professionals, also working as firms;
- Public/private subjects whose data transmission is mandatory or necessary in compliance with regulations or functional to the relationship management;
- Freight Forwarders and Logistics Companies.

Distribution: Your personal data will not be distributed in any way.

Data Storage Period. In accordance with the principles of lawfulness, limitation of purpose and minimisation of data, pursuant to art. 5 of the GDPR, the data storage period for your personal data is:

- set for a timing not larger than the one which implies its purpose achievement, given the aim to collect data, and collected and processed for the execution and fulfillment of contract purposes;
- established as a period of time not exceeding the purposes for which the data were collected and processed and complying with the compulsory times required by law.

Data Controller: the Data Controller, as defined by the Law, is Sea Vision S.r.l. (Via Treves 9E 27100 Pavia (PV) , 27100 Pavia (PV); VAT no.: 01638840189; contactable as follows: E-mail: privacy@seavision.it) in the person of its current legal representative.

The Data Protection Officer (DPO) designated by the Data Controller pursuant to art. 37 of the GDPR is:

- Epta-Key S.r.l. nella persona dell'Avv. Giovanbattista Bernardo (Via Luigi Majno, 5 , 20122 Milano (MI); VAT no.: 08923570967; contactable as follows: E-mail: dpo@seavision.it; Telephone: 02 3657 6041).

You are entitled, by application to the Data Processor, to obtain the erasure (right to be forgotten), restriction, updating, rectification and portability of your personal data, to object to their processing, and in general to exercise all your rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

You may also examine whenever you like the updated version of the present report by connecting to the following web site https://www.privacylab.it/informativa.php?18831422233&lang=en.

## Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her exist, regardless of their being already recorded, and disclosure of such data in intelligible form, and the right to lodge a complaint with the supervisory authority.

2. The data subject has the right to be informed of:

a. the source of the personal data;
b. the purposes and methods of processing;
c. the logic applied if the data are processed by electronic devices;
d. the identification data concerning the Data Controller, the Data Processors and the representative designated as per article 5, comma 2;
e. the entities or categories of entity to whom or which the personal data may be disclosed and who or which may get to know said data as designated representative in the State's territory, as data processors or as persons in charge of the processing.

3. The data subject is entitled to obtain:

a. the updating, rectification or, where interested therein, integration of the data;
b. the erasure, anonymisation or blocking of data that have been unlawfully processed, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed;
c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were disclosed or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right that is to be protected;
d. the portability of the data.

4. The data subject has the right to object, in whole or in part:

a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
b. to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.

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## Data subject consent form

Data : ..... Place : .....

Name, Surname: .....

Do you consent to the processing of your personal data for the optional purposes set out below?

☐ **YES** ☐ **NO** Marketing and Advertising

Data subject: