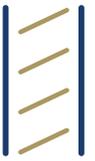




CRUISE PARKING

VENEZIA TERMINAL PASSEGGERI S.p.A.



FULL DISCLOSURE NOTE PURSUANT TO ART. 13 OF REGULATION EU N. 679/2016

PARKING SERVICE

Pursuant to Articles 13 and 14 of Regulation (UE) n. 679/2016 (*General Data Protection Regulation*) (*hereinafter, also referred to as GDPR*), the Data Controller shall provide to the Data Subject the following information:

1 Data Controller

The Data Controller of your personal data is the company:

Venezia Terminal Passeggeri S.p.A., with registered office in 30135, Venice, Marittima, Fabbriato 248, in the person of its *pro-tempore* legal representative. The contact details are the following:

e-mail: titolare.trattamento@vtp.it

Fax: 0039 041 240 3091.

2 Data Protection Officer

The Data Protection Officer (RPD/DPO) appointed by the Data Controller, can be reached for any and additional data processing issues, at the following contact details (Art. 38, Point 4, GDPR):

e-mail: dpo@vtp.it

Fax: 0039 041 240 3091.

3 Lawfulness of Processing of Personal Data

The personal data collected are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (Art. 5, *lett. C*, GDPR).

The personal data are processed lawfully, fairly and in a transparent manner, pursuant to **Art. 5 and Art. 6, point 1, lett. b) and c) GDPR**, for specified, explicit and legitimate purposes as follows. In particular, the lawfulness of this processing, is the following:

b) "The processing is necessary for the performance of a contract to which the data subject is party" (Art. 6, Point 1, *lett. b*):

1. to manage the implementation of pre-contractual measures, as well as manage the implementation and fulfillment of contractual obligations;
2. to allow the correct management of access in the predefined Parking Areas;
3. to allow the correct use of booking or payment services;
4. to allow the correct management of any requests by the Data Subject;
5. Within the existing contractual relationship, the Data Owner may send questionnaires and/or customer care surveys, related to the quality of the service provided (*i.e. customer care*).

c) "The processing is necessary for compliance with a legal obligation to which the Data Controller is subject" (Art. 6, Point 1, *lett. c*):

6. Compliance with the obligations foreseen by the Community law, regulations and acts having force of law, as well as the ordinances, orders issued by the Public Security Authorities and/or judicial authority;
7. Fulfillment of the obligations set by the Regulation EU n. 1177/2010 related to the rights of passengers travelling by sea and inland waterways, in order to provide to PRM passengers (passenger with reduced mobility), assistance within ports. In particular, reference is made to PRM placard mentioned under art. 381 of DPR 16 December 1992 n. 495 and subsequent amendments and additions.

a) "The Data Subject has given consent to the processing of his or her personal data for one or more specific purposes" (Art. 6, Point 1, *lett. a*).

The Data Controller, without prejudice to the exercise of the right of withdrawal of consent by the Data Subject and that must be guaranteed at any time (Art. 7, Point 3, GDPR) (*the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal*), even by filling in and sending the **Rights Exercise Form** available in the Privacy Policy Web page of the Web site www.vtp.it, may process the personal data collected, for the following purposes:

1. sending by e-mail, sms, WhatsApp, dedicated App, paper mail and/or direct telephone contact, *newsletter*, communication and commercial, promotional, and/or advertising material, related to the services provided by the Data Controller;

Processing operations related to the purposes referred to in the above-mentioned point 1, are jointly known as **Marketing Activities**. Only with your prior consent, free, specific (with respect to the purposes of processing as per point 1) and 2), informed (with regards to this policy) you can be the recipient of the **Marketing Activities** as above. Without prejudice to the purpose of archiving for statistical purposes of the personal data subjected to a non-reversible process of pseudonymisation, for the protection of his/her right during judicial proceedings.

4 Processing of Personal Data

The personal data are processed according to the manner under Art. 5 GDPR, and are subject to certain processing operations under Art. 4, point 2, GDPR. In particular:

collection, recording, organization, storage, usage, mining, consultation, communication by transmission, erasure, destruction.

The data processing is carried out manually and/ or through I.T. and telecommunication tools with using data processing and organization software within the scope of the above-mentioned purposes. Since then, appropriate technical and organizational measures have been put in place for the protection of personal data. In relation to the achievement of the purposes referred to in the above-mentioned conditions **b)** and **c)**, the communication of personal data shall be deemed necessary. Failure, partial or incorrect communication of the requested personal data, can result in inability to provide the services referred to in the conditions **b)** and **c)**.

5 Communication and Transfer of Data

The Data Controller may disclose certain personal data for the achievement of the purposes referred to in points **b)** and **c)** to the following categories of Recipients:

*Supervisory bodies, National Anti-Corruption Authority, Privacy Authority for the protection of personal data, public security authorities, Authority of Harbour System, Harbour office, Health Units' Services for Prevention, competent Hygiene and Safety in the Workplace (SPISAL), maintenance company of computer and electronic management systems for the management and access to the parking areas, as well as any third party to whom the communication of personal data is made mandatory by law, or the fulfilment of the purposes referred to in the conditions **b)** and **c)**. With respect to the reported data, the recipients can operate as independent Data Controllers, unless otherwise designated. Personal data collected are also processed by the staff of the Data Controller, acting in compliance to specific instructions in order to respect aims and modes of the processing.*

The personal data processed for the purposes referred to in points **b)** and **c)**, are not subject to physical transfer to recipients located in a third country Extra EU. Personal data are not disseminated.

6 Retention Period

The retention period of personal data is limited to the minimum period of time strictly necessary for the purposes for which they are processed. With respect to the purposes of the Processing indicated:

b) "processing is necessary for the performance of a contract to which the data subject is party..."

(Art. 6, Point 1, *lett. b*): Personal data shall be stored for a period not exceeding **3 months** from the date of exit of the vehicle from the defined parking area or from the termination of the reference contract, without prejudice to any renewal thereof;

c) "processing is necessary for compliance with a legal obligation to which the controller is subject" (Art. 6, Point 1, *lett. c*): Personal data shall be stored for a period not exceeding **10 years**, from the termination of the reference contract.

Without prejudice in any case to a longer retention period as a function of personal data related to specific requests by the Prosecutor's Office and/or competent Judicial Police, as part of a specific investigation. Upon expiration of this retention period, the personal data shall automatically be deleted from the relevant media or rendered anonymous in a permanent and irreversible manner.

7 Rights of the Data Subject

The Data Subject may contact the Data Controller at any time, for the exercise of his/her rights and, specifically, request:

- the **access** to his/her personal data (Art. 15 GDPR);
- the **rectification** of his/her personal data (Art. 16 GDPR);
- the **erasure** of his/her personal data (Art. 17 GDPR);
- the **restriction of processing** of his/her personal data (Art. 18 GDPR);
- the **portability** of personal data (Art. 20 GDPR).

The Data Subject shall have the right to exercise the below-mentioned rights at any time:

- **Withdrawal** of processing consent to his/her personal data (Art. 7, Comma 3, GDPR);
- **Object** to the processing of his/her personal data (Art. 21 GDPR);
- **Lodge a complaint** to a Supervisory Authority (Art. 77 GDPR).

There are no automated decision-making processes, including profiling, producing legal effects concerning the Data Subject or similarly significantly affecting him or her (Art. 22 GDPR).

8 Methods of Exercising the Rights of the Data Subject

The Data Subject shall have the right to exercise the above-mentioned rights at any time, by contacting the Data Controller, even by filling in and sending the **Rights Exercise Form** that can be found in the Policy Web page of the Web site www.vtp.it. The Rights Exercise Form is an integral and substantial part of this privacy policy. The exercise of the rights of the Data Subject can take place by the following means:

- By sending an e-mail to the following address: titolare.trattamento@vtp.it
- By sending a fax to the following number: **0039 041 240 3091**

The updated list of any Data Controllers under Art. 28 GDPR, and of any person acting under the authority of the Data Controller under Art. 29 GDPR is available at the Data Controller headquarter's address.

(01/02/2023)