

## COMPANY LETTERHEAD

# INFORMATION ON THE PROCESSING OF PERSONAL DATA OF BOARD MEMBERS

This is to inform you, pursuant to articles 12 and 13 of the EU Regulation n. 2016/679 on the "Protection of natural persons with regard to the processing of personal data and on the free movement of such data" (hereinafter Regulation), that, in the context of performance relationship with **(insert company name)**, our company processes a set of personal data related to you and, possibly, to your relatives.

### 1. Identity and contact details of the Data Controller

The Data Controller is **(insert company name)**, based in **(insert company address)**.

### 2. Contact details of the DPO

Address: Corso d'Italia 35/b 00191 Rome – Phone number +39 06 845 611 fax +39 06 98968092e-mail address [dpo@damicoship.com](mailto:dpo@damicoship.com)

### 3. Purposes of the processing

The processing of personal data by **(insert company name)** will be for the purpose of the management of the performance relationship (execution and management of performance).

In particular, the processing of personal data may be performed to:

- a. Value the suitability of your profile with respect to the position held.
- b. Formalize and manage tasks and related payments related to fees / reimbursement of expenses.
- c. Fulfill administrative, insurance and tax obligations.
- d. Manage pre- contentious and contentious.
- e. Convene Board Members and send mail by **(insert company name)**.

### 4. Legal basis of the processing

The legal basis of the processing is represented by the art. 6, let b) and c) of the Regulation.

b) *Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;*

c) *Processing is necessary for compliance with a legal obligation to which the controller is subject.*

It is also represented by art.9 let. a) and b) of the Regulation.

- a) *The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;*
- b) *Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.*

#### 5. Methods of processing

These data will be processed both by computerized and paper based methods, observing the rules on the protection of personal data, including those relating to data safety.

#### 6. Categories of parties to whom personal data will be disclosed

The personal data you provide may be disclosed to public and private entities relevant to the purposes mentioned above.

The communication of personal data is carried out in accordance with the obligations provided by law as well as by specific powers granted by the parties concerned (such as of crediting of salary into banks). According to this, the personal data can be communicated to the Social Security Institutions, the Ministry of Finance, Insurance Companies and Credit Institutes, and any other entity that may request it, always respecting the extent required by law.

Your data may also be communicated to other companies of the d'Amico group based in the following non-EU countries: Singapore, Morocco, USA, Monaco, Liberia and Canada for needs related to the management of the performance relationship. The transfer of your personal data is regulated and guaranteed by the "GROUP PRIVACY REGULATION" (containing the "Binding Corporate Rules" pursuant to EU REGULATION 679/2016)", available at the following link <http://darwin.damicoship.com>.

It is understood, moreover, the obligation of **(insert company name)** to release information to the Judicial Authority, whenever required.

#### 7. Retention of personal data

The retention of your personal data will be carried out in compliance with security measures used by **(insert company name)** with regard to the protection of data, and the access to these data will be allowed only to subjects involved and designated for their processing.

The criteria used to determine the applicable retention period are: we will retain your personal data for the time (i) necessary for its purpose, (ii) necessary for the completion of the existing performance relationship, (iii) accepted by interested party and / or (iv) required by applicable laws.

Anyway your personal data will be kept until the limitation period of the rights deriving from the performance relationship.

### **8. Rights of the data subjects**

You can exercise in every moment the rights of art. 13, letter b) and art. 15, 16, 17, 18 and 20 of the Regulation, addressing to DPO, at the contact provided in point n. 2 of this information.

In particular, as a data subject, you will require:

1. The access to the personal data concerning you, according with the art.15 of the Regulation.
2. The rectification of inaccurate personal data concerning you, according with the art.16 of the Regulation.
3. The erasure of personal data concerning you ("right to be forgotten"), according with the art.17 of the Regulation.
4. The restriction of processing of data concerning you, according with art.18 of the Regulation.

We inform you, finally, that you will have the right to object in every moment, according with the art.21 of the Regulation, if one of the situations described by the art.6, paragraph 1, letters e) and f) of the same Regulation occurs.

### **9. Consent and Withdrawal**

You can revoke your consent in every moment, addressing the DPO.

### **10. Complaint to the supervisor authority**

With regard to art.77 of the Regulation, we remind you that you have the right to lodge a complaint to the supervisor authority if you think that the processing of your data is performed in violation of the provisions of the Regulation.

### **11. Nature of the processing and obligatoriness of personal data conferment**

Many of the processed data are required to perform the obligations arising from legal requirements and to fulfil respective performance obligations. In some cases, the lack of consent to the processing of personal data may make it impossible for **(insert company name)** to continue the working relationship established.

### **12. Existence of automated individual decision making in the processing**

It is specified that, for the processing of the data, there is **NOT** any kind of automated individual decision-making, according with the art.22 of the Regulation.

DECLARATION OF CONSENT TO THE PROCESSING OF PERSONAL DATA  
(Pursuant art. 7 and 9 of EU Regulation 2016/679)

Dear

(insert company name)

(insert company address)

**Object: Consent to the processing of personal data**

The undersigned \_\_\_\_\_, after having received the information under art. 12 and 13 of EU Regulation 2016/679 and aware of the rights established by art. 13, letter b) and by art. 15, 16, 17, 18 and 20 of the Regulation.

Gives consent

Denies consent

to the processing of personal data in the manner and for the purposes specified in the information to the extent that it is exploitable to the specific purpose pursued or to the provision of the requested services.

Gives consent

Denies consent

to the transfer of personal data within the d'Amico Group Companies even outside the EU, as specified in point 6 of the Information.

Date \_\_\_\_\_

Signature \_\_\_\_\_