

COMPANY LETTERHEAD

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF EMPLOYEES¹

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 employment relationship/collaboration/stage with **(insert company name)**, our company processes a set of personal data related to you and, possibly (in so far as is relevant to the employment relationship/collaboration/stage), 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 98968092
e-mail address dpo@damicoship.com

3. Purposes of the processing

The processing of your personal data by **(insert company name)** will be for the purpose of the management of the employment relationship/collaboration/stage (administration and management of personnel).

In addition, certain information relating to you may be used for the purposes related to the control of corporate management and to the protection of company's assets.

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

- a. comply with specific legal obligations connected to the established employment relationship/collaboration/stage (by way of example to social security and welfare institutions and statistical bodies);
- b. keep your position, also through the information system of **(insert company name)**;
- c. make payment of his salary through banks or similar organizations;
- d. make payment of union contributions in the hypothesis of your registration with trade unions or the exercise of your trade union rights;
- e. make various payments (insurance, etc.);
- f. manage of your administrative position (by the way of example, identification of presences and absences, sickness, accident, maternity and processing and issue of pay slips and periodic certifications);

¹ It is specified that the "Employees" data subjects' category includes also collaborators and staggers.

- g. manage of your position at the welfare / social security funds for you and possibly for your relatives;
- h. perform management and staff evaluation;
- i. manage of staff development plans (identification of training gaps, carrying out training activities and other similar activities to improve their professionalism);
- j. manage the internal organization of work;
- k. perform the internal and external trade union relations Company's;
- l. manage of any litigation, both judicial and extra-judicial and of the eventual antecedent phase;
- m. protect of assets of (insert company name);
- n. protect of safety;
- o. send mail by (insert company name) and its subsidiaries and associates.

We want to clarify that with regard to the aims at letters l) and m) (insert company name) provided a specific information to the data subjects.

Commentato [MV1]: Available only for video surveillance system. If not applicable please DELETE.

Commentato [MV2]: If not applicable please DELETE

4. Purposes in relation to special categories of personal data

With regard to the data concerning your health, according with the article 9 of the Regulation, the processing will be carried out for:

- the compliance with or performing of specific tasks as required by European Law, laws, regulations or collective agreements, also corporate, in particular for the enforcement of legislation on social security and assistance also integrative, on health and safety at work and elsewhere, as well as on taxation, the protection of health, order and public safety;
- fulfilling obligations arising from insurance contracts designed to hedge the risks associated with liability of the employer in matters of health and safety at work and occupational diseases, or for damage caused to third parties in the conduct of working and professional activities.

5. 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.

6. Methods 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.

7. 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 personal data may also be provided to parties appointed by **(insert company name)**, as external data processors for the purposes strictly related to the execution and the management of the contract/collaboration/stage in place.

Finally, your data may be communicated to other companies of the d'Amico group based in the following non-EU countries: Singapore, Morocco, USA, Principality of Monaco, Liberia and Canada, for requirements related to the management of your contract/collaboration/stage.

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.

8. 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 contractual/collaboration or stage 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 employment/collaboration/stage relationship.

9. Rights of the data subjects

You can exercise in every moment the rights of art. 13, letter b) and artt. 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.

10. Consent and Withdrawal

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

11. 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.

12. 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 contractual/collaboration/stage obligations. In some cases, the lack of consent to the processing of these data may make it impossible for **(insert company name)** to continue the employment/collaboration/stage relationship established. In other cases, this lack will not allow the delivery of benefits provided by law or by contracts or the development of activities aimed to improve your professionalism. In the end, the lack of consent will not allow the development of activities aimed to a better business management (e.g. improvement of work organization; development of your professionalism ...).

13. 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.

COMPANY LETTERHEAD

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 purposes pursued or to the provision of the requested services.

- Gives consent
- Denies consent

to the processing of special categories of personal data as reported at point 4. of the Information.

- Gives consent
- Denies consent

to the transfer of personal data within the d'Amico Group Companies even outside the EU, as specified in point 7 of the Information.

Date _____

Signature _____