

## POLICY UNDER THE PRIVACY RULE

Dear Sir,

to provide the requested services, we need to process your personal data.

We therefore invite you to carefully read this document, in which you will be able to find all information useful for understanding for what purpose and in what way the treatment will take place.

A short glossary with the definition of some terms used in this document is available in the appendix.

The information document may be subject to updates over time. We therefore invite you to consult the valid document every time you visit our premises.

## POLICY UNDER THE GENERAL RULES OF THE PERSONAL DATA PROTECTION (UE) 2016/679 (“GDPR”)

This information is provided pursuant to:

- of article 13 of the GDPR, if you have contacted our company directly for construction or refitting of pleasure boats;
- of article 14 of the GDPR, if your personal data have been communicated to our company by brokers, agents or other third parties.

### HOLDER OF THE PERSONAL DATA PROCESSING

**TANKOA YACHTS S.P.A. - VIA CIBRARIO LUIGI 1H NERO – 16154 - GENOVA -  
VAT IT03538070107 –F. C. 00214830788,**

(TANKOA here in after) that you can contact via the stated address or via the email address [privacy@tankoa.com](mailto:privacy@tankoa.com).

Tankoa Yachts s.p.a. has a DPO that can be contacted at [dpo@tankoa.com](mailto:dpo@tankoa.com)

### ORIGIN OF YOUR DATA AND CATEGORY OF THE PROCESSED DATA

The data being processed are those provided by you when you contact us, directly or through third parties, for information, to enter into negotiations or to establish commercial relationships. The personal data collected are name, surname, tax code, telephone number, address, email, as well as the tax data for issuing the sales invoices of the boats. We also treat the images taken by the video surveillance system as well as the images that portray you during events and / or demonstrations in which you could participate.

### JURIDICAL PURPOSES OF THE PROCESSING

TANKOA processes your personal data as defined above and indicated for the purposes illustrated below and according to the lawfulness bases referred to in the GDPR and specified alongside.

- a) To respond to specific requests for the provision of services by the customer (GDPR, art. 6, paragraph 1, letter b), and for the related sending of information, quotes or the provision of the requested service;
- b) For legal obligations to which the data controller is subject (GDPR, art. 6, paragraph 1, letter c) By way of example and not limited to, for the fulfillment of the accounting and tax obligations of TANKOA;
- c) For the pursuit of the legitimate interest of the owner (GDPR, art.6, paragraph 1, letter f). By way of example and not limited to:

- fight against fraud (estimates without subsequent activities);
- response to specific requests from competent Authorities;
- protection of company rights in court and out of court;
- protection of corporate assets with access controls;
- sending commercial communications (newsletters) in order to promote our products / services and our initiatives towards acquired customers;

d) For exclusively promotional, information and disclosure purposes of the owner's activity (GDPR, art.6 paragraph 1, letter a): the images taken or videos taken during events and / or events are processed with your express specific consent for the publication on photographic documentation or on video media, including our website or social platforms.

TANKOA does not carry out any automated processing of your personal data for the purpose of making decisions that concern you.

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## OBBLIGATORIETA' DELLA COMUNICAZIONE DEI DATI

Failure, partial or incorrect provision of the data requested at the time of the establishment of the relationship is mandatory for the provision of the requested service. The consent referred to in point d) above is free and its absence does not affect the existing relationship or the use of the services requested, but simply prevents us from using your image for the aforementioned promotional and dissemination purposes.

## LUOGO DI TRATTAMENTO DEI DATI E MODALITA' DI TRATTAMENTO

Your data are processed in the territory of the European Union or in countries allowed by the GDPR. For contract requirements, they may be transferred to third countries outside the European Union, but in this case they will be appropriately minimized and adequate measures will be taken to guarantee their protection. All operations - collection, processing, consultation, printing, archiving, modification, updating - can be carried out on paper or by electronic means.

## COMMUNICATION OF YOUR DATA TO THIRD PARTIES

Your data may be communicated by TANKOA for the purposes mentioned above, to:

- connected billing management system of the Revenue Agency;
- commercial or professional companies for the execution of accounting seals;
- Companies to whom we have entrusted support for Information Technologies;
- Natural and legal persons that TANKOA uses for the publication of images or video footage;
- Companies specialized in email marketing services;
- Customer solvency and credit recovery company;
- Companies that provide access point control services to the company;
- Certification and auditing company of services and products provided for the maintenance of TANKOA qualifications;
- Suppliers of parts of the finished product to execute particular customer requests;
- Subcontractors where necessary for the execution of the subcontracted part.

These subjects will be communicated only the minimum personal data necessary for the execution of the part of the service within their competence. These subjects, where provided, will be appointed as data processors pursuant to art. 28 GDPR. The list of Data Processors is available on simple request.

Personal data are processed by data processors under the authority of TANKOA all trained on the reference privacy legislation. Personal data are not disclosed except for the images if you have given your free consent.

## STORAGE PERIOD OF THE DATA

The data collected for the purposes a) and b) of the previous point will be kept for the period required by law and no later than 10 years from the closure of the fiscal year in which the sale took place.

The data collected for the purpose c) are kept for a maximum of 24 months from the collection of the data, without prejudice to other legal terms. In case of protection of the rights of the owner, the data will be processed for the time necessary to mature the prescription.

The images collected for the purpose d) are processed until the revocation of your consent.

## YOUR RIGHTS

You have the right to request and to receive, at any time, information regarding your personal data processed by TANKOA or to request their correction. Where applicable, you have the right to request cancellation, to limit its processing and to receive, in a structured format, commonly used and readable by automatic device, the personal data concerning you; also has the right to object to the processing of your data, pursuant to the provisions of art. 21 GDPR, or to propose a complaint to the competent Guarantor Authority in accordance with the provisions of art. 77 GDPR. You can direct any request regarding your rights directly to TANKOA at the address [privacy@tankoa.com](mailto:privacy@tankoa.com)

**POLICY END**

## RILASCIO DEL CONSENSO PER PUBBLICAZIONE IMMAGINI

I the undersigned \_\_\_\_\_

I CONSENT

I DO NOT CONSENT

also pursuant to art. 10 c.c. and articles 96 and 87 of Law 633/1941 on Copyright, the publication and disclosure on the corporate website and on social platforms for exclusively promotional, information and disclosure purposes (referred to in point d of the information), of images taken and taken videos performed during demonstrations and / or events.

I also declare that for the specific use that will be made of my authorized images, I will not request any consideration and, by signing this clause, irrevocably renounce any right, action or claim deriving from the above authorized.

Data \_\_\_\_\_ and signature \_\_\_\_\_

## DEFINITIONS

Privacy Regulation:	All the legislation relating to personal data protection represented, without limitation: EU Regulation 2016/679 (GDPR), Legislative Decree 196/2003 (CODE), Directive 680/2016, Legislative Decree 101/2018, Legislative Decree 51/2018, Lines Guide of the EDPB (ex WP29), ethical rules and general authorizations of the Guarantor Authority, provisions of the Guarantor Authority where applicable, international regulations of the area, e-privacy guidelines, technical standards on the security of treatments, ...).
Processing:	any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or sets of personal data, such as the collection, registration, organization, structuring, conservation, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, cancellation or destruction.
Processing Holder:	the natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of processing personal data.
Personal Data:	any information concerning an identified or identifiable ("interested") natural person; the natural person who can be identified, directly or indirectly, with particular reference to an identifier such as the name, an identification number, location data, an online identifier or one or more characteristic elements of his physical identity is considered identifiable, physiological, genetic, psychic, economic, cultural or social.
Involved people	identified or identifiable natural person connected to the Customer (such as contact data) to which the data refer.
Controller	the natural or legal person, public authority, service or other body that processes personal data on behalf of the data controller.

END