

**PRIVACY POLICY IN COMPLIANCE WITH EUROPEAN GENERAL DATA PROTECTION REGULATION NO.
2016/679 ("GDPR") – REVIEWED ON OCTOBER 11, 2023**

Present policy is released in compliance with:

- Art. 13 of EU GDPR, in case of direct contact with our company.
- Art. 14 of EU GDPR, in case your personal data have been communicated to our company by other companies of the Group, agents, brokers or other third parties.

DATA CONTROLLER

Data controller is Gerolamo Scorza S.p.A. (TVA no. 02892360104) address: Via Isolagiugno, 33 – 16013 Campo Ligure (Genoa, Italy), Ph. (+39)010/9218201, e-mail address: gerolamoscorza@gerolamoscorza.it (herein after called Scorza) that you may contact through aforesaid address or by email at privacy@gerolamoscorza.it
Scorza is part of the holding Genova Industrie Navali S.p.A.- address: Via dei Pescatori Molo Cagni -16128 Genoa - Italy, which has appointed a Data Protection Officer who can be contacted by email at dpo.ginholding@privacyinchiario.it

PERSONAL DATA SOURCES AND CATEGORIES

Personal data being processed are those supplied when you contact us, directly or through third parties, to get information, arrange commercial agreement or to set up commercial relationships. Collected personal data are name, surname, tax code, phone number, e-mail address, as well as fiscal information for invoicing.

PURPOSE AND LEGAL BASIS OF DATA PROCESSING

Scorza processes your data for following purposes and in compliance with legal basis advised in EU GDPR 679/2016 and in Legislative Decree no. 196/2003 (Privacy Code):

- a) To follow up on customers' specific requests for services supply (GDPR, Art. 6, Par. 1, letter b and for the relevant submission of information, quotation and supply of required service).
- b) In accordance with law provisions foreseen for Data Controller (GDPR, Art. 6, Par. 1, letter c) including but not limited, the fulfilment of Scorza's fiscal obligations.
- c) For the pursuance of Data Controller's legitimate interest (GDPR, Art. 6, Par. 1, letter f). Including, but not limited:
 - I. countering fraud (quotations without commercial agreement).
 - II. replying to specific requests from competent authorities.
 - III. company rights protection in judicial and extrajudicial proceedings.
 - IV. protection/treatment concerning company's incidents.

Scorza does not collect any of your personal data for the purpose of making automated decisions.

MANDATORY NATURE OF DATA DISCLOSURE

Any missing, partial and/or non-compliant disclosure of data required for above-specified purposes may hinder the service supply.

DATA PROCESSING LOCATION AND METHOD

Your data are treated in EU countries or in countries compliant with GDPR provisions. Due to contractual needs, your data could also be transferred to extra-EU countries, but in this case, they will be properly minimized and compliant measures will be taken to ensure data protection. All the relevant operations – including filing, working, processing, printing, storing, editing, updating – could be carried out by paper or through electronic tools.

DATA DISCLOSURE TO THIRD PARTIES

Your data, which could be processed by paper or electronic tools, won't be circulated, but could be transferred to competent Authorities for administrative and institutional purposes, in accordance with current law provisions. More in detail, personal data could be advised to third parties belonging to following categories:

- Stakeholders or other companies belonging to the Group.
- IT systems management companies.
- Advisors, self-employed persons, financial institutions and banks, lawyers etc.
- Customers working as frontend to ensure the best possible service.
- External parties appointed for management and maintenance of IT systems also on cloud and on the company's technical equipment.
- Advisors for fiscal matters.
- Authorities and Public entities competent for law provisions.
- Banks and insurance companies.
- Judicial and/or Public Security Authorities whereas expressly provided for law.

- Other contractors or sub-contractors if involved in service supply.

These subjects will collect only those data which might be required for service supply. Concerned parties, if foreseen, will be appointed as Data Processors in accordance with Art. 28 of GDPR. List of Data Processors will be available upon request.

Personal data could be processed by Scorza's authorized personnel, duly trained and sensitized to privacy specific theme, to data confidentiality and safeguarding the dignity of interested parties.

Scorza does not perform any activity related to profiling.

DATA RETENTION PERIOD

Data collected for purposes described at points a) and b) will be retained in compliance with law provisions and, in any case, for not more than 10 years from sales relationship relevant financial year.

Data collected for purposes described at point c) will be retained up to 24 months by the time of collection, notwithstanding any different law provision. In the event of legal protection of data controller, data might be processed until the accrual of prescription.

YOUR RIGHTS

It is your right to request and receive, in any moment, information and/or rectification upon your personal data processed by Scorza. If applicable, it is your right to request data cancellation or processing restriction and to receive relevant personal data in structured format, for common use and reading. You can address any request regarding your rights directly to Gerolamo Scorza by e-mail at privacy@gerolamoscorza.it

It is also your right to object to your data processing, in compliance with Art. 21 of GDPR, or to file a complaint to Privacy Authority in accordance with Art. 77 of GDPR.

REVIEWS

Scorza reserves the right to review this policy, to then circulate and keep into account the latest release –

REVIEWED IN OCTOBER 2023