



WEB SITE POLICY

This policy is provided for pursuant to Regulation 679/2016 (EU) to the users visiting the following web page:

tramp.cosulich.com (the “Website”)

The policy describes the management of the Website as regard to the processing activities concerning personal data of users who visit its web pages. Specifically, it regards the content of the Website only and it does not concern any other web site that might be visited by users by clicking on external links which may be available on the Website.

1. WHO IS THE DATA CONTROLLER?

Fratelli Cosulich S.p.A. is the Data Controller of your personal data (“Fratelli Cosulich S.p.A.”, “We” or “Us”).

2. WHAT IS PERSONAL DATA? WHY IS YOUR PERSONAL DATA PROCESSED?

“Personal Data” means any information relating, directly or indirectly, to an identified or identifiable natural person, for the purposes of this policy, you who are visiting the Website (“Data”).

In particular, Fratelli Cosulich S.p.A. processes the Data listed here below:

- - your name and surname;
- - your contact data (such as, your phone and e-mail);
- - place and date of birth and other information you might give us while you are sending your application
- - the IP address of your PC.

When you visit the Website, We may collect your Data either directly (e.g., where you voluntarily decide to interact with the Website’s features, by providing your Data as asked for in specific forms) or indirectly (e.g., by tracking your IP address in order to monitor the use of the Website).

More in details, Fratelli Cosulich S.p.A. directly collects your Data, should it be necessary to satisfy your requests made through the Website’s features.



Through the Website, the user may also contact Fratelli Cosulich S.p.A. by fulfilling specific forms available on the Website.

When you visit the Website, your Data is collected indirectly as well, as we track both the IP address and the URL of your device.

Moreover, your Data might also be collected and processed in order for Us to carry out activities relevant to the management and the administration of the Website.

You are free to decide whether or not providing us with your Data; however, should you fail to provide your Data, Fratelli Cosulich S.p.A. won't be able to satisfy the requests you might submit.

In any case, we are committed to ensure that the information we collect and process is adequate with regard to the purposes hereby indicated and that said processing does not involve an invasion of your privacy.

3. IS DATA TRANSFERRED TO ANOTHER COUNTRY? IS DATA DISCLOSED TO OTHER ENTITIES?

The Website is located on a server in Fratelli Cosulich S.p.A., ponte Morosini 41 16126 Genova.

For the purposes specified above, your Data may be transferred to other legal entities within the group located in countries inside the European Union.

Your Data may also be transferred to third parties providing services for the management, the maintenance and the development of the Website and, generally speaking, IT services.

Your Data might also be transferred to third parties located outside the European Economic Area offering IT services in favour of Fratelli Cosulich S.p.A.; should this transfer be necessary, we are committed to ensure that appropriate measures are put in place in order to ensure that the level of protection of natural persons guaranteed by the Regulation is not undermined.

4. HOW LONG IS PERSONAL DATA RETAINED FOR?

We will keep your personal data only as long as it is reasonably necessary for the purposes described in this Privacy Statement.

On topic, we reserve the right to store Log Data longer, if there are facts which suggest that computer crimes are committed against the Website.



5. HOW CAN I EXERCISE MY RIGHTS AS DATA SUBJECT?

At any time, you, as data subject, have the right to:

- Access to your Data we have and ask for a copy;
- Obtain the rectification or the update of your Data, should it be inaccurate or incomplete;
- Provided that the relevant conditions are met, obtain the erasure of your Data or the restriction of processing of your Data;
- Ask for Data portability.

Finally, you have the right to object at any time to the processing of your Data, or to lodge a complaint before the supervisory authority.

For any further information about the processing activities carried out by the Data Controller, and/or the exercise of your rights, you may contact Fratelli Cosulich S.p.A. at the e-mail address info@cosulich.it or by express courier at Fratelli Cosulich S.p.A., ponte Morosini 41, 16126 Genova.