

PRIVACY POLICY APP TRUCK INFO TDT

Pursuant to the articles 13 and 14 of the EU Regulation 2016/679 "GDPR"

This policy describes, pursuant to the Art. 13 of the EU Regulation 2016/679 (General Data Protection Regulation, hereinafter GDPR), the modalities of processing of personal data provided by the User during the use of this App. The processing will be based on the principles of lawfulness, transparency, fairness and protection of the confidentiality and rights of the User, always in accordance with national and European legislation currently in force (d.lgs. 196/2003, d.lgs. 101/2018, Reg. UE 2016/679 "GDPR").

The Data Controller

The Data Controller is Terminal Darsena Toscana s.r.l., Loc. Darsena Toscana - Porto Industriale - 57123 Livorno; telephone: 0586/258111.

E-mail: privacy@tdt.it.

Data Protection Officer (DPO)

The Data Protection Officer is Digital Strategy S.r.l.s., with registered office in Via dei Lanzi 33, 57123, Livorno (LI). In the event of a violation of the legislation on the protection of personal data, you can contact the Data Protection Officer at the email address dpo@tdt.it.

Type of data collected

Terminal Darsena Toscana collects personal information about the User.

Specifically, the personal data processed through the App are as follows:

- i. Navigation data

Device and installation data, processed in order to allow the proper operating of the App.

- ii. Data voluntarily provided by the User by filling in the form for reporting damages

First and last name, telephone number (this is entered at the first report and at subsequent reports it will be pre-filled), location data, photographs. Any other data inherent to the use of the service managed through the App, including any information entered in the free "notes" field.

- iii. Data voluntarily provided by the User to fill out a booking request for container pickup and/or delivery

Name of the driver, license plate number, transport company to which the User belongs.

This service is available upon registration through the website www.tdt.it and, therefore, the User will be required to enter username and password to Log in.

It should be noted that, where it is the transport company that enters the driver's personal data (name), it will be responsible for providing this privacy policy to the driver concerned.

Purposes and legal basis of processing

The data provided will be processed, in accordance with the conditions of lawfulness under Article 6 GDPR, for the following purposes:

- Device and installation data are processed in order to allow the proper operating of the App.
- Personal and contact data, and data relating to the use of App services, are necessary for the purpose of User identification, report registration, and for any subsequent reporting activities.
- For the service of damage reporting, phone location data, data and time of damage reporting, are necessary for TDT to verify that the report was sent within the perimeter of the Terminal and during work activity.

For the service of damage reporting, the processing of the data collected has as its legal basis the legitimate interest of the Data Controller (art. 6 (f) GDPR) in reducing time for the damage reporting process, benefiting both the driver and the company's damage department.

For the pickup and/or delivery booking service, the processing is to be considered lawful since it is related to the execution of the transportation contract (Art. 6(b) GDPR).

Mandatory or optional nature of data provision and consequences of refusal to provide data

The provision of data is optional as downloading the App is voluntary and at any time the user can uninstall it. However, the provision of data is an indispensable condition for processing the damage report.

Container pickup and/or delivery booking services are also available without the help of the App, through the appropriate section of the website www.tdt.it.

Method and place of processing

The Data Controller performs the necessary processing operations through internal subjects specifically authorised to process data. Data processing is carried out through automated tools (using electronic procedures), in any case by means instruments and procedures that guarantee security and confidentiality, with organisational methods and logic strictly related to the purposes indicated. The Data Controller processes personal data in compliance with current security provisions in order to minimise the risks of destruction and loss, including accidental loss, of data, of unauthorised access, of processing that is not permitted or does not comply with the purposes of collection and of unlawful or incorrect use of the data.

The data are processed at the Data Controller's headquarters and in any other place where the parties involved in the processing are located. For further information, please contact the Data Controller.

Data retention

The data will be processed for the strictly necessary time to fulfil the User's requests or - in general - to achieve the purpose for which they were collected. The data collected through the reporting form will be stored locally within the App for a period of thirty days or until the User uninstalls the App from its device. In case of reinstallation, any previous reports will no longer be visible.

The data will be stored on the company server for a period of two years.

Data on container pickup and/or delivery reservations will be stored for a period of five years.

Data communication

The User's personal data will not be disclosed to unspecified people but may be communicated both to the Company's employees as authorized data processors (within the scope of their duties and for the purposes indicated above), and to the Data Processors pursuant to Article 28 of the GDPR, appointed to carry out technical, development and support activities on the App. A complete and up-to-date list of the Data Processors is available on request.

The data may be communicated also to the subjects who have the right to access the data by force of provisions of the law's or regulation's provisions or in application of European legislation, within the limits and for the purposes foreseen by such provisions.

Transfer outside the EU

Personal data will not be transferred abroad to non-EU countries that do not ensure adequate levels of personal data protection. If this would be necessary to provide the User with services or to conclude a contract, we ensure that the transfer of personal data to non-EU countries will take place in compliance with Articles 44 et seq. of the GDPR.

User's Rights

The User, if applicable, may exercise the rights pursuant to Articles 15 to 22 of the GDPR, including but not limited to, the access to personal data (obtain confirmation as to whether or not personal data concerning him exist, even if they have not yet been recorded, and their communication in intelligible form; obtain information about the origin of personal data, the purposes and methods of processing, the categories of data, the recipients or categories of recipients to whom the personal data have been or will be communicated and the storage period); the deletion of data or the restriction of processing.

The exercise of the rights listed may be done by sending a request to the e-mail address privacy@tdt.it or to the other contact details of the Data Controller indicated in this document.

The User may also file a complaint with the Control Authority or take legal action.

Updates and amendments to this document

This document is constantly being updated: the Data Controller reserves the right to make changes at any time, also in consideration of the amendment of the laws or regulations that govern this matter and protect the User's rights. The amendments shall apply from the date of publication on the Website/App. The User is therefore invited to consult this section regularly to check the publication of the most up-to-date Privacy Policy.

This document was updated on May the 2nd 2023.