

In this document Terminal Darsena Toscana s.r.l., as the Data Controller, provides the following Privacy Policy:

- 1) Privacy Policy website [www.tdt.it](http://www.tdt.it)
- 2) Privacy Policy TDT Info Truck App

## 1) PRIVACY POLICY WEBSITE

Dear User,

this policy describes, pursuant to the Art. 13-14 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 navigation and use of this website.

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, GDPR).

### The Data Controller

The Data Controller is Terminal Darsena Toscana s.r.l., Loc. Darsena Toscana - Porto Industriale - 57123 Livorno; tel: 0586 258111; e-mail: [privacy@tdt.it](mailto:privacy@tdt.it).

### Type of data collected

Terminal Darsena Toscana collects personal information about the User.

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

- i. navigation data: the IT systems and software procedures used for the operating of the websites may acquire, during their normal functioning, some data whose transmission is implicit in the use of Internet communication protocols. This category of data could include IP addresses or domain names of the computers used by users who connect to the site, URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, and other parameters relating to the user's IT environment. This data is only used for the purpose of receiving anonymous statistical information on the use of the website, in order to improve the browsing experience and manage the services we provide;
- ii. data provided directly by the User through the "Registration" section: the data required are: first name, surname, e-mail, job title, company and position held, type of customer, address, telephone and fax numbers, as well as the chosen username;
- iii. data provided by the User in order to use the functions made available for each customer type, through its own Reserved Area (e.g. driver's name, license plate number, company, for booking pick-up and/or delivery of containers). It should be noted that, where it is the trucking company that enters the driver's personal data (driver's name), it shall provide this privacy policy, also drafted in accordance with Article 14 of the GDPR, to the driver concerned.

For any information on data processing carried out through the **Info Truck App** made available to use some specific features, please refer to the **App's Privacy Policy (doc. 2)**;

- iv. personal data collected when the User sends an e-mail to the e-mail addresses indicated on the site in order to receive information, or to request a specific service: in this case the sender's address, necessary to reply to the request, as well as any other personal data included in the message, will be processed;
- v. personal data, including "special" data, contained in CVs and cover letters, provided by the User by sending application to the e-mail addresses indicated on the website.

### 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:

- to execute the User's requests and to answer questions formulated at the e-mail addresses indicated on the site.

The processing of the data collected has as its legal basis the legitimate interest of the Data Controller (art. 6 (f) GDPR) to be more efficient, provide information on the services offered as well as improve and develop new products and services;

- to execute all pre-contractual and contractual measures adopted at the request of the User, as well as all related operational and management requirements.

The legal basis in this case is represented by the need to execute the contract to which the User is a party or to execute pre-contractual measures (Art. 6 (b) GDPR);

- to comply with legal obligations to which the Data Controller is subject.

In this case, the legal basis is represented by the need to comply with legal obligations that require the Data Controller to process certain types of personal data (Art. 6 (c) GDPR);

- The processing of data contained in the CVs and cover letters received is lawful because it is necessary to implement pre-contractual measures (Art. 6 (b) GDPR) taken at the request of the data subject. The processing of "special" data is lawful on the basis of the Supervisory Authority Provision of 5 June 2019, containing "Prescriptions relating to the processing of special categories of data, pursuant to Article 21, paragraph 1 of Legislative Decree No. 101 of 10 August 2018", supplementing and amending the General Authorisation No. 1/2016.

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

The provision of data is optional, but in some cases it is an indispensable condition for being able to satisfy the User's requests and for the effective fulfilment of commercial and contractual relations, as well as to enable the use of the functions made available in the Reserved Area or to ensure compliance with legal obligations provided for by administrative and fiscal regulations; therefore, failure to provide data will make it impossible to establish contractual relationship or to fulfill the obligations contractually undertaken. In the "Registration" section, the data considered mandatory are marked with a red arrow, while the provision of further data is purely optional.

### **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 using both paper media and electronic tools, using 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 offices and in any other place where the parties involved in the processing are located. For further information, please contact the Data Controller.

### **Data communication**

The User's personal data will not be disclosed to unspecified people but may be communicated to:

- professionals, collaborators, legal persons and third parties who provide technical and organisational services on behalf of Terminal Darsena Toscana. These subjects will process the data as Data Controllers, Joint Data Controllers or Data Processors, for the purposes specified. A complete and up-to-date list of the Data Processors is available from the Data Controller;
- 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.

### **Data retention**

The data will be processed for the strictly necessary time to fulfill the User's requests or - in general - to achieve the purpose for which they were collected. The data may also be stored for the entire duration of the commercial and contractual relationship and also in compliance with the storage periods provided for by law for administrative and fiscal purposes, or for as long as necessary to respond to any inquiries from the Authorities.

### **Links to other websites**

This information is provided only for this website and not for other websites that may be consulted through links. Terminal Darsena Toscana cannot be responsible for personal data provided by users to external parties or to any websites linked to this site.

### **User's Rights**

Pursuant to Articles 15 to 22 of the GDPR, the User may exercise the following rights:

- access to personal data: the right to 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 the rectification or erasure of the data or the restriction of their use;
- obtain information about the source of the personal data, the purposes and methods of the processing, the categories of data, the recipients or categories of recipients to whom the personal data have been or will be disclosed and the storage period;
- to oppose - for legitimate reasons - the processing of all or part of the personal data and, in particular, to oppose the processing of the data for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication;
- data portability;
- revoke consent, at any time, without prejudice to the lawfulness of the processing based on the consent given before revocation;
- to file a complaint with the supervisory Authority or take legal action.

The exercise of the rights listed, with the exception of letter g), may take place by sending a request to the e-mail address [privacy@tdt.it](mailto:privacy@tdt.it) or to the other contact details of the Data Controller indicated in this document.

### **Removal from registered users**

The User may at any time request completely independently to be removed from the list of registered Users. Once connected to the site of TDT, in his preferences he will find the function "Unregister". Since this function causes the complete removal of all data, it is not possible to send an e-mail to confirm the operation.

### **Data Protection Officer (DPO)**

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

### **Cookie Policy**

This website uses cookies. To find out more and to view the detailed information, the User can consult the Cookie Policy.

## **2) 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](mailto: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](mailto: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](http://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](http://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](mailto: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 2<sup>nd</sup> 2023.