



**CTS S.p.A.**

**Compagnia Trasporti e Spedizioni**

Via dello Stagnino 6/8 – 48125 Roncalceci (RA)

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Iscrizione Albo Autotrasportatori: RA 4406623Y

**PERSONAL DATA PRIVACY POLICY**  
**(pursuant to Art. 13 of Regulation EU No. 2016/679)**

Pursuant to Articles 13 and 14 del **of Regulation EU No. 2016/679** (GDPR), the underwriting company CTS S.p.A., with address in Via dello Stagnino, 6/8 - 48125 Roncalceci (RA), in its capacity as Data Controller, hereby informs you that the collected personal data with reference to the business relations engaged in, will be processed in compliance with the regulation indicated above.

As regards such processing, the following information is also provided.

**Purposes for data processing**

Your personal data are being collected directly and processed for the following purposes:

- a) administration bookkeeping and updating, as well as other obligations envisaged by the law, regulations and ministerial memoranda regarding fiscal and administration/accounting matters;
- b) fulfillment of contractual obligations and of whatever envisaged in the regulations in force pertaining to tenders, works, supplies and services;
- c) execution of contracts entered into with you and of the related commitments; fulfillment of legal obligations connected to the contract relationship; organizational management of the contract; external professional service contracts for the fulfillment of legal obligations; safeguard of contractual rights; internal statistical analysis.

**Data processing methods and periods of storage**

The collected personal data will be processed using manual, digital and telematic methods and placed in databases to which only personnel expressly authorized for data processing will have access.

The data are processed for reasons closely linked to the purposes listed above, for the time necessary and as identified by the laws and anyhow in such a way as to guarantee compliance with the provisions of the law and anyhow in such a way as to ensure compliance with the laws as well as the protection of confidentiality, security, correctness and pertinency of the data.

The data are not processed using automated decision-making processes nor are they subjected to profiling.

**Provision of data and consequences of failure to give consent**

The provision of the data and their processing are mandatory with regard to the purposes relating to the contractual and legal obligations as well as to those purposes that refer to the carrying out of all the activities of the Data Controller called for and functional to the execution of legal and contractual obligations. Should you refuse to provide data for the purposes indicated above, this may prevent the Data Controller from initiating the business relationship and from fulfilling the legal obligations.

The provision of the data and their processing is considered optional in the other situations.

**Scope of communication and dissemination of data**

As regards the purposes indicated, the collected personal data may be communicated to the subjects or categories of subjects indicated here below:

- judicial authorities;
- financial administration, social security and aid associations;
- police;
- workers' trade unions or other associations based on specific requests;
- sectorial associations and consortia;
- companies running information and telematic networks;
- accounting and fiscal auditing companies;
- postal service companies;
- banks and financial institutions with regard to financial business management and companies, bodies, consortia or other organizations, working in the fields of insurance, banking and similar sectors, within the scope of the activities performed;



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- debt collection companies or bodies for the purposes of their relating activities;
- financing bodies and operators of public funds and partner subjects;
- legal counsel, physicians and other technical consultants.

The foregoing subjects will act as autonomous data controllers.

The personal data may be transferred, for the purposes declared, to European member states, to the categories of subjects indicated above, if the transfer is necessary towards fulfilling the obligations deriving from contracts the data subject is a party to.

### **Rights of the data subject**

Regulation EU 2016/679 envisages that the data subject may exercise specific rights, as defined in articles from 15 to 21, given here below:

- a) **Right to obtain access** to personal data and to the following information:
  - confirmation as to whether or not personal data concerning him or her are being processed;
  - the purposes of the processing;
  - the categories of personal data concerned;
  - the recipients or categories of recipient to whom the personal data have been or will be disclosed;
  - where the personal data are not collected from the data subject, any available information as to their source;
  - the existence of automated decision-making, including profiling;
  - a copy of the personal data to be processed.
- b) **Right to rectification** and completion of incomplete personal data;
- c) **Right to erasure** of the data (“right to be forgotten”) where one of the following grounds applies:
  1. the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  2. the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
  3. the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
  4. the personal data have been unlawfully processed;
  5. the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the data controller is subject;

Where the controller has made the personal data public and is obliged to erase the personal data, the controller shall inform other controllers which are processing the personal data that the data subject has requested the erasure of any links to, copy or reproduction of his or her data.

- d) **Right to restriction of processing** where one of the following applies:
  1. the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
  2. the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  3. the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
  4. the data subject has objected to processing, pending the verification whether the legitimate grounds of the controller override those of the data subject.
- e) **Right to data portability** or the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided. Where technically feasible, the data subject has the right to have the personal data transmitted directly from one data controller to another.
- f) **Right to object** at any time to processing of personal data concerning him or her, including profiling, especially when:



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1. the processing is based on the data controller's legitimate interest, subject to the demonstration of the grounds for objection;
  2. the personal data are processed for direct marketing purposes.
- g)** Right not to be subject to a decision based solely on **automated processing**, including **profiling**, unless when the decision: is necessary for entering into, or performance of, a contract between the data subject and a data controller, is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests or is based on the data subject's explicit consent.

Should the data be collected by the Data Controller following the giving of consent, the data subject has the right to withdraw the consent at any time.

Requests for exercising the rights of the data subject envisaged in Reg. EU 2016/679 may be submitted to the data controller by writing to: [privacy@pec.ctstrasporti.it](mailto:privacy@pec.ctstrasporti.it)

Should he or she deem that one or more of his/her rights have been violated, the data subject has the right to lodge a complaint with the supervisory authority ('Garante per la Privacy' in Italy) using the procedure indicated by the authority itself.

**Data controller and Data processor, Data Protection Officer**

Data controller is CTS S.p.A., located in Via dello Stagnino, 6/8 - 48125 Roncalceci (RA), in the person of its pro tempore legal representative.

Pursuant to Art. 37 of the Regulation, the data controller is exempted from designating a Data Protection Officer.

Roncalceci, 26 May 2018

SIGNED The Data Controller