

## INFORMATION ON THE PROCESSING OF PERSONAL DATA

### PURSUANT TO EU REGULATION 679/2016 (GDPR)

In compliance with the provisions of Articles 13 and 14 of EU Reg. 2016/679 (GDPR), we provide you with the information due under the law regarding the processing of your personal data, including information on your rights and their exercise.

#### DATA CONTROLLER

The data controller of personal data, pursuant to art. 4 of the Regulation, is Marina di Portisco S.r.l. (hereinafter also "data controller"), with registered office in Olbia (SS), Strada Panoramica Costa Smeralda Km 0,100 - Località Portisco - 07026, P. IVA. 01760480903, Telephone: (+39) 0789 33520, email: [Privacy\\_MarinaDiPortisco@IGYMarinas.com](mailto:Privacy_MarinaDiPortisco@IGYMarinas.com).

#### PURPOSE OF PROCESSING

Your personal data may be processed, in compliance with applicable legislation and in accordance with the principles of lawfulness, fairness, transparency and minimization, for purposes strictly related and/or instrumental and/or ancillary to the purposes specified below:

- I. Purposes connected with the performance of contractual obligations and the management of the contractual relationship, including any pre-contractual measures taken at the request of the data subject (such as the compilation of personal data lists, the making of notifications, the drawing up of contracts, invoicing, the organisational management of services, bureaucratic formalities)
- II. Purposes connected with obligations provided for by laws, regulations and national and European Union legislation, as well as with provisions issued by Authorities empowered to do so and by supervisory and control bodies (in particular, in compliance with accounting and tax obligations)
- III. Purposes connected with the pursuit of the legitimate interests of the data controller and of third parties (e.g. for the exercise and/or defence of a right in judicial, administrative or arbitration and conciliation proceedings; to ensure the security of one's own property or that of third parties)
- IV. Marketing purposes and promotional and commercial communication regarding products or services of Marina di Portisco S.r.l., of other Companies of the Island Global Yachting (IGY) Group and of third parties, as well as purposes of direct sales and market research, including surveys on the quality and satisfaction of services, directly or through other Companies of the IGY Group and third parties with which Marina di Portisco S.r.l. has established collaboration agreements.

#### LEGAL BASIS AND NATURE OF THE CONFERMENT

The provision of personal data for the purposes stated above in points I to III is compulsory and does not require the consent of the data subject, as it is necessary to allow the fulfilment of legal obligations, the performance of contractual obligations and/or pre-contractual measures, as well as the pursuit of the legitimate interests of the data controller or of third parties, with the consequence that any refusal to provide data will make it impossible for the data controller to correctly and fully fulfil the obligations related to the specific purpose.

The legal basis for the purpose of the processing referred to in point IV is represented by the consent of the data subject. The refusal to provide such consent shall have no consequences, in particular, for the proper performance of the contract. Furthermore, any consent given for processing for this purpose may be revoked at any time. Without prejudice to the lawfulness of the processing carried out before the revocation.

#### DATA SUBJECT TO PROCESSING

For the aforementioned purposes, personal data - including, if necessary, special data - collected in the context of your relations with the Company Marina di Portisco S.r.l. may be processed, including:

- I. Personal data (name, surname, place and date of birth, tax code), data relating to the address of residence and/or domicile, telephone numbers (landline and mobile) and telematic (e-mail address), details of identification documents and data contained therein (identity card, driving licence, passport);
- II. Data provided by you for the management of contractual or pre-contractual relations with Marina di Portisco S.r.l. (such as accounting data);
- III. Data acquired for the pursuit of the legitimate interest of the data controller or third parties;
- IV. Data communicated by you in order to carry out the above-mentioned promotional and commercial purposes, including data provided as part of service quality and satisfaction surveys.

## PROCESSING METHODS

Your personal data will be processed in full compliance with the provisions of the regulations in force, by means of paper or automated (computer/electronic) tools, according to logics strictly related to the regular performance of processing for the above-mentioned purposes and, in any case, in such a way as to guarantee security and confidentiality.

## DATA STORAGE

Your personal data will be kept for the time strictly necessary to achieve the purposes for which they were collected, as well as to comply with legal obligations (in particular, tax and fiscal) and the possible protection of rights, including in court.

## COMMUNICATION OF DATA

Your personal data will be accessible to the employees of the data controller, in their capacity as authorised/personal data processors for the performance of specific tasks and/or functions, as well as to the external collaborators and service providers of the data controller, duly designated as data processors, to the extent that this is strictly necessary for the pursuit of the aforementioned purposes.

For requirements strictly related to the processing purposes set out above, your data may also be communicated, in Italy and/or abroad, to the following types of entities in particular

- I. Other companies belonging to the IGY Group
- II. Public authorities and administrations, public bodies and other entities to which the communication is due in compliance with regulatory obligations
- III. Entities, professionals, companies, service providers and other parties appointed by the data controller for requirements functionally connected to the performance of Marina di Portisco S.r.l.'s activities, including administrative, accounting and management fulfilments connected to the performance of contractual services
- IV. Banks, financial institutions, insurance companies.

The list of data processors designated by the Data Controller is available upon request of the Data Subject.

## TRANSFER OF DATA

Your personal data may be transferred outside the European Union, in full compliance with the legal provisions applicable to the transfer of personal data outside the EU.

## RIGHTS OF THE DATA SUBJECT

At any time, the Data Subject has the right to exercise the rights provided for in the Regulations and, in particular:

- I. Right of access to your personal data, pursuant to Article 15;
- II. Right to rectification of inaccurate data and/or right to supplement incomplete data, pursuant to Art. 16;
- III. Right to erasure, anonymisation or blocking of personal data, pursuant to Section 17;
- IV. Right to restriction of processing, pursuant to Section 18;
- V. Right to be informed of rectification, erasure and restriction of processing, pursuant to Section 19;
- VI. Right to portability and right to transmit data to another data controller, pursuant to Art. 20;
- VII. Right to object to the processing of data for legitimate reasons, also with reference to processing for marketing and profiling purposes, if any, pursuant to Art. 21.

To exercise the rights provided for by the legislation, the data subject may contact the data controller at the following email address: [Privacy\\_MarinaDiPortisco@IGYMarinas.com](mailto:Privacy_MarinaDiPortisco@IGYMarinas.com).

The data subject also has the right to lodge a complaint with the *Garante per la protezione dei dati personali* if he/she considers that his/her personal data have been processed unlawfully.

The Italian version is the legal binding version.