



PRIVACY NOTICE

Pursuant to art 13 of Regulation (EU) 2016/679 (hereinafter, the “**GDPR**”) and in relation to data provided by the Client or obtained by the Controller during the contractual relationship for the proposed services, the Client is hereby informed that its data will be processed by the following means and for the following purposes:

1. DATA CONTROLLER

RINA S.p.A., whose registered office is in Genoa (Italy), via Corsica 12, Tax code and VAT n° 03794120109, as well as the Company(ies) in the RINA Group are Joint Controllers according to art.26 GDPR. The Controller can be contacted via the contact details shown on the www.rina.org website, or via the e-mail address for the Data Protection Officer rina.dpo@rina.org.

2. PURPOSE OF PROCESSING

The Controller processes the personal data (hereinafter, “**personal data**” or also “**data**”) provided by the Client:

a. Without having to obtain your explicit consent, for the following purposes:

- pre-contractual activities aimed at the proposal of offers and the establishment of the contractual relationship for the provision of the Controller's services (such as for example in the case of contact details collected directly from the interested data subject or otherwise publicly available);
- to fulfil contractual, administrative and fiscal obligations arising from relationships in force (like fiscal data for the issuance of the invoice and relevant payment even if electronic, or contact details necessary for the registration and access to restricted areas on online platforms or mobile applications);
- fulfil the obligations established by the specific contractual terms of the requested service and/or by any binding accreditation and/or certification requirements (such as the collection of audit evidence or other supporting documentation, also containing special categories of personal data defined at art. 9 GDPR such as health certificates, if required by law or by reference standard and therefore mandatory to obtain the service itself, provided both through traditional and digital methodologies, or furnished by remote tools);
- to fulfil the obligations imposed by law or by an order of the competent Authority;
- to exercise the Controller’s rights, such as the right of defence in a lawsuit.

b. Only with your prior consent, for the following promotional purposes:

- to send you e-mails, post, sms and/or telephone calls, newsletters, commercial communications, and/or advertising materials on products or services offered by the Controller, and to measure the level of satisfaction with the quality of such services.
- to use your images, photos and videos, taken on the occasion of the provision of the



service, to document the success of the initiative, with the possibility of publication on the website www.rina.org, on the Company's official social media channels, or others external communication channels selected from time to time.

3. PROCESSING METHOD

The Controller will process personal data in accordance with the principles of lawfulness, fairness and transparency.

Your personal data are processed by means of the following operations: collection, recording, organisation, structuring, storage, consultation, adaptation or alteration, use, dissemination, disclosure by transmission, retrieval, alignment or combination, restriction, erasure or destruction of the data. Your personal details are subjected to both hard-copy and electronic processing.

The Controller will process the personal data for the time necessary to carry out the purposes indicated above and, in any case, for not more than 30 years from termination of contractual relations and not more than 2 years from collecting data for marketing purposes.

Once 10 years have passed since the contractual relations have ceased, access to the data will be limited to heads of departments.

Should the Controller have a documented need to store the data for a period longer than 30 years (e.g. if erasure could compromise its legitimate right to defence or in general, to safeguard its company assets), such further storage shall take place, limiting access to said data to the head of the legal department only, in order to guarantee the legitimate exercising of the right of defence of the Controller.

4. RECIPIENTS OF THE DATA

Your data may be made accessible for the purposes indicated in art 2.a and 2.b to the following recipients:

- affiliate companies or subsidiaries of RINA Group, in Italy and abroad, to the extent to which this is necessary for processing, in conformity to the binding corporate rules adopted by RINA Group;
- companies or other third entities (credit institutions, professional firms, consultants, insurance companies for providing insurance services, auditing companies, supervisory institutions, etc.) who carry out activities on an outsourcing basis, on the Controller's behalf;
- public entities, for fulfilling legal obligations.

Without requiring your explicit consent, the Controller may communicate your data for the purposes indicated in art 2.a to supervisory bodies, judicial authorities, insurance companies for providing insurance services, as well as to entities to which communication is mandatory in terms of the law, for carrying out said purposes.



5. TRANSFERS OF DATA

Personal data are stored on servers located within the European Union. In any case, it is understood that, should this be necessary, the Controller will have the right to move the servers even outside the EU. In such a case, the Controller hereby guarantees that transfers of data outside the EU will be done in accordance with the applicable laws, also by means of including standard contractual clauses provided for by the European Commission, and adopting binding corporate rules for intra-group transfers.

6. LEGAL BASIS OF THE PROCESSING

The provision of data and related processing for the purposes indicated in art. 2.a is necessary in order to guarantee the Controller's services you have requested, and for implementing the contract and any pre-contractual obligations. The legal basis of the aforementioned processing can be found in art. 6, par. 1, b) GDPR. Any refusal will make it impossible for the Controller to provide the services covered by the contract.

Providing data for the purposes indicated in art. 2.b, on the other hand, is not mandatory. You may, therefore, decide not to provide any data or subsequently refuse processing of data already provided. The legal basis of the aforementioned treatment can be found in art. 6, par. 1, a) GDPR, the only consequence of such refusal will be that receiving newsletters, commercial communications, and advertising materials related to the services offered by the Controller will not be possible. However, you will continue to have the right to the services indicated in art. 2.a.

7. RIGHTS OF THE DATA SUBJECT

As the data subject, you have the right to:

- i. obtain confirmation of whether or not personal details regarding you are processed or not, as well as to obtain a copy of said data;
- ii. obtain an indication of: a) the source of the personal data; b) the purposes and means of processing; c) the logic involved in the case of processing done with the help of electronic instruments; d) the identity and the contact details of the controller, controller's representatives, processors and data protection officer; e) the recipients or categories of recipients to which the personal data can be communicated, or who can come to know the same as the designated representative within the territory of the State, processors, or employees who carry out processing;
- iii. obtain: a) updating, rectification, or completion of the data; b) erasure, transformation into an anonymous form or blocking of data processed in violation of laws; c) certification that the operations referred to in letters a) and b) have been made known, also in relation to their content, to those to whom the data have been communicated or disclosed by transmission, unless this is impossible or involves a disproportionate effort; d) a structured format, from the Controller, commonly used and provided in an intelligible and easily accessible form



- with the personal data related to you, and, where technically feasible, to obtain transmission of said data directly from one controller to another;
- iv. object to: a) processing of your personal data, even if pertinent to the purpose for which they were collected. b) processing of your personal data for the purposes of sending advertising or direct sales materials, or for carrying out market research or commercial communication, using automated telephone calling systems without an operator, by e-mail and or by means of traditional telephone and/or hard copy postal marketing methods. Such right of object may also be exercised only in part, thereby allowing the data subjects to choose whether to receive only communications using traditional means or only automated communications, or neither of the two types of communication.
 - v. Therefore, in your capacity as Data Subject, you have the rights pursuant to Arts. 15 – 21 of GDPR, as well as the right to lodge a complaint with the competent Authority pursuant to art 77 of GDPR.

8. PROCEDURE FOR EXERCISING RIGHTS AND COMMUNICATIONS

The Controller has appointed a Data Protection Officer, who can be contacted for all matters related to processing of your personal data and the exercising of related rights.

Therefore, you may contact the Data Protection Officer at any time, using the following procedure:

- by sending a registered letter with notification of receipt to RINA S.p.A., via Corsica 12, 16128 Genova, for the attention of the Data Protection Officer, or by
- by sending an e-mail message to rina.dpo@rina.org.

We wish to state that you have the right to withdraw the consent given at any time by writing to rina.dpo@rina.org.