

INFORMATION ON THE PROCESSING OF PERSONAL DATA

ACCORDING TO REG. 679/2016

Dear Interested,

we provide below some information that you need to bring to your knowledge, not only to comply with legal obligations, but also because the transparency and fairness towards those involved is a fundamental part of our business.

1. The data controller and contact details, recipients

At the foreword, for any terminological clarification you can consult the glossary of the Guarantor: <http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1663787>.

The Data Controller of your personal data is TELECFE, responsible for the legitimate and correct use of your personal data and who can contact for any information or request at the following addresses:

Data Controller: TELECFE

Headquarters: VIA DEI CALZOLAI 156 FERRARA

Contacts and contact details:

E-mail info@telecfe.it

Telephone +39 0532 724033

Fax +39 0532 724819

The recipients to whom the data can be revealed are:

- 1) External managers and independent data controllers;*
- 2) Public bodies and Italian public authorities for legal obligations;*
- 3) Any Italian freight forwarders, professionals or consultants (independent or responsible owners) for sending / withdrawing home orders, maintenance of the website and information security, legal, compliance or in any case related to the conduct of economic activity- production of the owner.*

2. Data processed, purpose, legal basis, conservation

2.1 Navigation data of the company website

Purpose: functioning of the website

Legal basis: execution of a request by the interested party

Duration of data retention: cancellation at the end of the website navigation

Following the consultation of the www.telecfе.it website (referred to as the "Site"), for the effect of sending an e-mail via the "Contacts" and "Support" section or to an e-mail address indicated on the Website, or for the request of goods or services through the Website, personal data will be processed relating to identified or identifiable natural persons ("Treatment").

The computer systems and software procedures used to operate the Site acquire, during their normal operation, some personal data whose transmission is implicit in the use of internet communication protocols. This is information that is not collected to be associated with identified individuals, but that by their very nature could allow users to be identified.

This category of data includes the IP addresses or the domain names of the computers used by the users connecting to the Site, the Uniform Resource Identifier (URI) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error) and other parameters related to the operating system and the user's computer environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the Site and to check its correct functioning and are deleted immediately after processing. The site does not use cookies to transmit information of a personal nature, nor are used so-called persistent cookies, or systems for tracking users.

The use of so-called session cookies (which are not stored permanently on the user's computer and disappear when the browser is closed) is strictly limited to the transmission of such session identifiers (consisting of random numbers generated by the server) required to allow the safe and efficient exploration of the Site. The session cookies used on this site avoid the use of other technologies that could compromise the privacy of users' browsing and do not allow the acquisition of personal identification data. See the COOKIE POLICY in detail on the www.telecfе.it website.

2.2 Data provided voluntarily by the user, execution of a contract or pre-contractual requests by the interested party

Purpose: reply to the requests of the interested party, stipulation and execution of a contract or pre-contractual requests of the interested party

Legal basis: execution of a request by the interested party

Duration of data retention: up to the completed reply of the requests made, for the entire duration of the contract

Requirements during the pre-contractual negotiation phase or the stipulation and execution of a contract with the holder entail the collection of personal data necessary for these obligations, as required by the type of service or contract requested. In any case, special sensitive or judicial data will not be processed, but only the data necessary for the management (including administrative and accounting) of the relationship.

Furthermore, the optional, explicit and voluntary sending of emails to the addresses indicated on the Site or other communications sent through the use of the "Contact" and "Support" section, entails the subsequent acquisition of the sender's address, necessary to reply to the requests, as well as any other personal data included in such communications. We do not collect sensitive data and criminal judicial or irrelevant or necessary on the request, their possible presence in communications will result in the immediate cancellation of such data. In the case of third-party data, you guarantee that we will provide such data and that you have performed all necessary steps (eg by providing this information in advance to that third party, if due).

2.3 For all the above information, contextually

Purpose: protection of rights in court

Legal basis: legitimate interest

Duration of data retention: up to the limitation period of the rights exercisable in court.

The requested data previously processed will be kept for a period of 10 years in civil matters (Article 2946 of the Italian Civil Code) or other different term (also in the criminal area or other) in order to establish evidence for the assessment, exercise or defense in judgment by the owner.

2.4 For all the above information, contextually

Purpose: execution of a legal obligation or upon request by public authorities, e.g. in case of investigations and judicial investigations

Legal basis: legal obligation

Duration of data retention: for the entire time established by applicable regulations.

The data required, in accordance with the law, by law enforcement agencies, judicial authorities, information and security bodies or other public entities for the purposes of defense or security of the state or prevention, detection or repression of crimes.

3. Nature of the data and consequences of a refusal to respond

Apart from what is specified with reference to navigation data and fulfillment of pre-contractual and contractual requests, which are necessary in order to allow users a correct use of the Site (otherwise, the Site can not technically be consulted) and to meet pre-contractual requests and contractual, interested parties are free to provide their personal data to request a response from the TELECFE: failure to provide data will make it impossible to obtain what is required, if it requires the processing of personal data. In case of failure to provide for a legal obligation, it will be subject to the consequences and / or penalties provided for by applicable laws.

4. Methods of processing, data of third parties

Personal data are processed by manual, computerized and automated systems for the time strictly necessary to achieve the purposes for which they are collected. The owner has specific security measures to ensure that the processing is in compliance with the law, with particular regard to preventing the loss of such data, illicit or incorrect use or unauthorized access to databases. In any case, the processing of personal data will be performed exclusively by authorized internal parties, appropriately developed by the constraints imposed by privacy legislation and internal procedures.

For the exclusive execution of your requests for services or information (contractual and pre-contractual), you can also communicate the data of third parties (eg employees, collaborators, consultants, etc.); in this case, we guarantee to provide this information to these third parties before communicating such data, and in any case to communicate them to us in compliance with the law and the rights of such third parties. These data will be kept for as long as necessary for the execution of your requests for services or information.

5. Rights of the interested party

In addition to this information, in order to guarantee the correct and transparent processing of your data, you must be aware of the fact that:

- Has the right to ask the data controller to access their personal data, requesting confirmation or not of their existence as well as the correction or cancellation of the same or the limitation (temporary block) of the processing that concerns it;
- Has the right to object to their treatment at any time for reasons related to his particular situation in the event of: i) processing necessary for the performance of a task in the public interest or connected with the exercise of official authority, or ii) case of pursuit of legitimate interest of the holder;
- If you have given consent for one or more specific purposes, you have the right to revoke this consent at any time;
- Has the right to lodge a complaint with the following Supervisory Authority: Guarantor for the protection of personal data (<http://www.garanteprivacy.it>); has the right, however, to alternatively propose a complaint to the competent authority of the Member State where he habitually resides, works or the place where the alleged violation has occurred.
- Has the right to the portability of his personal data (for those with a legal basis of contractual or consensual execution) by requesting the holder, by means of communication of a file in .csv, .xml or similar format.

The processing takes place through automated processes that do not determine the profiling of the interested parties.

To exercise the aforementioned rights, users can write an email to the info@telecfe.it, indicating the subject "Privacy - exercise of rights pursuant to Article 12 of Regulation 679/2018".

6. Communication and dissemination of data

Personal data collected on the Website and / or collected for purposes related to contractual obligations and / or data provided voluntarily by the interested party, are not subject to disclosure and will not be sold or sold to third parties. They may be communicated to the recipients indicated in point 1 above, as necessary for the owner in pursuit of the aforementioned purposes.

In any case, the communication of data required by law enforcement authorities, judicial authorities, information and security bodies or other public entities for defense or security purposes of the State is reserved; prevention, detection or repression of crimes.