

## PRIVACY POLICY

We inform users about certain personal data processing activities related to the use of this website and of which San Cataldo Container Terminal SpA (the “**Company**”) is the data controller.

### A. Purpose and legal basis of processing

- 1 The Company will acquire the personal data that the user voluntarily includes in communications sent through the e-mail addresses or telephone numbers indicated on the website, as well as through the “Contact Form” section, and addressed to the Company.

Legal basis: the processing of personal data is carried out on the basis of the legitimate interest of the Company to respond to users’ requests (Art. 6 c.1 lett. f of the EU Regulation 2016/679 or GDPR).

- 2 If you apply for a job with the Company, we collect your identification data (name, e-mail address, physical address and telephone number) and your professional or work information (CV, cover letter, *etc.*) in order to be able to examine and take your application into consideration.

Legal basis: personal data are processed insofar as necessary for the performance of pre-contractual measures requested by the data subject (Art. 6 c. 1 lett. b of the GDPR). If the user provides data belonging to special categories (*e.g.*, health data), this will be processed on the basis of his/her consent (Art. 6 c. 1 lett. a of the GDPR).

### B. Compulsory or optional nature of providing data

The provision of data may be necessary for the pursuit of the above-mentioned purposes, and a refusal to provide such data may make it impossible for the Company to respond to your request or consider your application.

### C. Disclosure of data

Personal data may be accessible to Yilport Holding AS., the parent company, with its registered office in Turkey (“**Yilport**”). The Company and Yilport have signed a data protection agreement with the standard contractual clauses approved by the European Commission on 4 June 2021 after having assessed the level of personal data protection guaranteed by Turkish law.

Except as specified in the preceding paragraph, personal data shall be processed exclusively by employees and/or collaborators of the Company, formally authorised to process them, trained in the protection of personal data and instructed also with reference to the correct application of the security measures implemented by the Company to protect and safeguard the personal data.

The personal data collected will not be disseminated in any way.

### D. Period of data retention

Personal data required for purpose A.1 will be stored for the time necessary to manage and answer the request. If the request comes from a Company's customer, the data will instead be stored even beyond the termination of the contractual relationship between the Company and the customer, taking into account the statute of limitations prescribed by law.

Personal data required for purpose A.2 will be stored for 2 years.

#### **E. Rights of users**

We inform users that, in accordance with the provisions of the GDPR, they have the right to ask the Company for access to their personal data, to obtain their update and rectification or (in the cases provided for by law) their deletion, the restriction of the processing concerning them or to oppose their processing; in the cases provided for by law, they also have the right to receive their personal data in a structured, commonly used and machine-readable format and to transmit them to another data controller without hindrance. Users, where the Company has collected data on the basis of their consent, have the right to revoke their previously given consent at any time. Lastly, they have the right to lodge a complaint with a supervisory authority (e.g. in Italy, the "*Garante per la Protezione dei Dati Personali*"), in the European Union country in which they habitually reside, work or in the place where the alleged violation occurred.

#### **F. Identification details of the Data Controller and the Data Protection Officer**

The Data Controller of the aforementioned processing is the company San Cataldo Container Terminal S.p.A., with registered office in SS 106 Ionica, Molo Polisettoriale, 74123 Taranto (TA); should the user require further information or wish to exercise one or more of his/her rights as described above, he/she may contact the Company by writing to: [ittar.gdpr.dg@yilport.com](mailto:ittar.gdpr.dg@yilport.com).

The Company has appointed a Data Protection Officer (DPO) pursuant to Article 37 of the GDPR, Mr Luigi Di Roma, who can be contacted by writing at: [l.diroma@vigilantediroma.it](mailto:l.diroma@vigilantediroma.it).