



C. Steinweg - GMT S.r.l.

Trieste Branch: Radice Molo II - Punto Franco Vecchio - 34135 Trieste - Italy - Phone: +39-040-4528119 - Fax: +39-040-4528120
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PRIVACY POLICY

This communication is made available to you - also pursuant to articles 13 and 14 of the European Regulation 2016/679 on the protection of personal data ("Regulation" or "GDPR") and subsequent amendments and additions, and pursuant to art. 13 of Legislative Decree no. 196 of 30/06/2003 Code on the protection of personal data ("Privacy Code") - by C. Steinweg - GMT s.r.l., with registered office in Genoa (GE), via Scarsellini n. 119, in its capacity as Data Controller of your personal data.

The purpose of this Information Notice is to inform you about the way in which your personal data will be processed.

Type of data processed

The website offers content of an informative and sometimes interactive nature. While browsing the site C. Steinweg - GMT s.r.l. may, therefore, acquire information about the visitor in the following ways:

Navigation data

The computer systems and software procedures used to operate this website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes: IP addresses, the type of browser used, the operating system, the domain name and addresses of websites from which access was made, information on the pages visited by users within the site, access time, the length of time spent on the individual page, internal path analysis and other parameters relating to the user's operating system and computer environment.

Further categories of data

This refers to all those personal data provided by the visitor through the site, for example, by registering and/or accessing a reserved area and/or a service and/or participating in one of the initiatives of C. Steinweg - GMT s.r.l., by writing to an e-mail address of C. Steinweg - GMT s.r.l. to request information, or by calling one of our toll-free numbers to have direct contact with the customer service.

Purpose of processing

The data provided are processed for the following purposes:

- To provide the good and/or service requested by the user, to manage the contracts finalised by the user, to carry out the relevant administrative, accounting, fiscal and legal fulfilments, and to process the requests forwarded by the user. Processing for these purposes is necessary for the fulfilment of contractual obligations and does not require specific consent from the data subject.
- To measure the user experience of our platforms, products and services we offer and to ensure the correct functioning of the web pages and their content. The processing carried out for these purposes is based on a legitimate interest of the Data Controller.
- Send commercial communications relating to promotions and/or offers, in the interest of the Controller; processing for these purposes is carried out with the specific consent provided by the user.

Sharing and transfer of personal data

The data collected by C. Steinweg - GMT s.r.l. will only be shared for the above-mentioned purposes; we will not share or transfer your personal data to third parties other than those indicated in this Privacy Policy.

In the course of our activities and exclusively for the same purposes as those listed in this Privacy Policy, your personal data may be transferred to the following categories of recipients:

- The company staff;

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Croatia Office
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51000 Rijeka - Croazia
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C. Steinweg - TPG D.O.O.
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Egypt - Alexandria Agent
alexandria@eg.steinweg.com

Società a responsabilità limitata con socio unico - soggetta alla direzione e coordinamento di società estera C. Steinweg - Handelsveem B.V.

Capitale Sociale € 867.000,00 interamente versato • Codice Fiscale e Partita IVA (V.A.T. Number) 01304960105

E-mail: gmt@it.steinweg.com • genoa@it.steinweg.com • PEC: gmt@pec.gmt-net.it

Website: italy.steinweg.com

REA: GE - 335473



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- service providers, (e.g. IT system providers, cloud service providers, database providers and consultants);
- Public Administrations for purposes of the law;
- any public and/or private entity to which it is necessary to communicate your personal data in connection with the above-mentioned purposes.

The updated list of Data Processors is available at the Controller's registered office and will be provided upon written request.

C. Steinweg - GMT s.r.l. may have to transfer your personal data to countries outside the European Union/European Common Space (EEA), to so-called "third countries". Such transfers to third countries may include all of the above activities.

This Privacy Policy is also applicable in the case of transfer of data to third countries where the level of data protection differs from that in the European Union. In particular, the international transfer of data may take place in the following situations:

- a) Group companies: Group companies based outside the European Union have signed data protection agreements using contractual clauses in line with the standards set by the European Commission to protect privacy and legitimise international data transfers;
- b) Third countries outside the European Union/EEA: any transfer of personal data to third parties will be made only after having informed you and, where required, after having received your consent. Any transfer of data to countries other than those for which the European Commission has taken an adequacy decision shall take place on the basis of agreements using standard contractual clauses adopted by the European Commission or other appropriate safeguards in accordance with applicable law.

Personal Data Protection

C. Steinweg - GMT s.r.l. has implemented appropriate technical and organisational measures to provide an adequate level of security and confidentiality for personal data.

These measures take into account:

- state-of-the-art technology;
- the costs of its implementation;
- the nature of the data;
- the risk of the treatment.

The purpose is to protect them against accidental or unlawful destruction or alteration, accidental loss, unauthorised disclosure or access, and other forms of unlawful processing.

Furthermore, when handling your personal data, C. Steinweg - GMT s.r.l.:

- collects and processes personal data that are adequate, relevant and not excessive, as required to fulfil the above purposes, and
- ensures that these personal data remain up-to-date and accurate.

Data retention periods

Without prejudice to your right to object to the processing of your personal data and/or to request its deletion, C. Steinweg - GMT s.r.l. will only retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected and received, or to comply with legal or regulatory requirements.

The retention period is the time of their actual use, plus the time until legal claims become time-barred.

When this period expires, your personal data will be removed from the active systems of C. Steinweg - GMT s.r.l.

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Your legal rights

The rights attached to personal data that C. Steinweg - GMT s.r.l. processes are:

- **RIGHT TO RECTIFICATION.** You may obtain the rectification of personal data concerning you or communicated to us by you. C. Steinweg - GMT s.r.l. makes reasonable efforts to ensure that the personal data in its possession is accurate, complete, up-to-date and relevant, based on the most recent information available;
- **RIGHT TO LIMITATION.** You may obtain a restriction on the processing of your personal data if:
 - You challenge the accuracy of your personal data during the period in which C. Steinweg - GMT s.r.l. needs to verify its accuracy;
 - The processing is unlawful and you request a restriction of the processing or deletion of your personal data;
 - C. Steinweg - GMT s.r.l. no longer needs to keep your personal data, but you need them in order to ascertain, exercise or defend your rights in court, or
 - You object to the processing while C. Steinweg - GMT s.r.l. checks whether its legitimate reasons prevail over yours.
- **RIGHT OF ACCESS.** You may request from C. Steinweg - GMT s.r.l. for information about the personal data stored about you, including information about which categories of personal data C. Steinweg - GMT s.r.l. owns or controls, for what purpose they are used, where they were collected (if not directly from you), and to whom they have been disclosed, if any;
- **RIGHT TO PORTABILITY.** Following your request, C. Steinweg - GMT s.r.l. will transfer your personal data to another data controller, if technically possible, provided that the processing is based on your consent or is necessary for the performance of a contract;
- **RIGHT TO ERASURE.** You can obtain from C. Steinweg - GMT s.r.l. the deletion of your personal data if:
 - Personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - You have the right to object to further processing of your personal data and exercise this right to object;
 - Personal data have been unlawfully processed.

Unless the processing is necessary because of legal or statutory obligations or in order to establish, exercise or defend a right in court.

- **RIGHT TO OBJECT.** You may object to the processing of your personal data at any time, provided that the processing is not based on your consent but on the legitimate interests of C. Steinweg - GMT s.r.l. or of third parties. In such cases, C. Steinweg - GMT s.r.l. will no longer process your personal data, unless we can demonstrate compelling legitimate grounds, an overriding interest in the processing or the establishment, or the exercise or defence of legal claims. If you object to the processing, please specify whether you wish to delete your personal data or to restrict its processing;
- **RIGHT TO LODGE A COMPLAINT.** In the event of an alleged violation of applicable privacy law, you may file a complaint with the competent authorities in your country or in the place where the alleged violation occurred.

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Changes to this privacy policy

Any future changes or additions to the processing of personal data as described in this Privacy Policy will be notified through the usual communication channels used by C. Steinweg - GMT s.r.l. (e.g. by e-mail or via the website).

Data Controller and Data Protection References

To exercise your rights under Articles 15 et seq. of the Privacy Regulation and Article 7 of the Privacy Code, you may contact the Data Controller, C. Steinweg - GMT s.r.l. with registered office in Genoa (GE), via Scarsellini n. 119, telephone 010469761, and email gmt@it.steinweg.com

The personal data protection officer is Mr Andrea Bartaini, telephone 010469761, and email gmt@it.steinweg.com.

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