

## **PROCESSING OF PERSONAL DATA INFORMATION PURSUANT TO EU REGULATION 679/2016.**

Pursuant to and for the purposes of Articles 12-14 of EU Regulation 679/2016 (hereinafter "GDPR"), DESFA (hereinafter the "Company"), as Data Controller, hereby provides you with information on the processing of personal data supplied by you in connection with capacity booking process related to the transportation service.

### 1. Purpose and legal grounds of the processing

The personal data will be processed by the Company for the purposes described below:

- a. management of the contractual relationship specified above;
- b. fulfilment of obligations foreseen by the Law and by provisions issued by Authorities legitimated to do so.

For the purposes described in points a) and b) the provision of data is essential; that is, to fulfil legal obligations as well as for a proper and efficient management of the contractual relationship.

### 2. Methods of processing

According to the aforementioned purposes, the processing of your personal data is carried out using manual or IT tools designed to store, manage and transmit the same data, solely for the purpose of pursuing the purposes for which they were collected and, in any case, in such a way as to guarantee the security and confidentiality of the company functions entrusted with the constitution, administration and management of the relationship, and whose staff has been appropriately instructed in order to guarantee confidentiality and avoid loss, destruction, unauthorized access or unauthorized processing of the same data.

The processing of all data provided will be carried out prudently and through forms of organization of the same strictly related to the obligations, tasks or purposes described in this disclosure.

### 3. Policy on the retention of personal data

The Company keeps in its systems the data acquired in a form that allows the identification of data subject parties for a period of time not exceeding the achievement of the purposes for which they are processed or to comply with specific regulatory or contractual

obligations, including those imposed by the current provisions on civil and fiscal matters.

Your personal data will be kept for the entire duration of the contractual relationship between you and the Company, as well as for further 2 years following the termination of the relationship. At the end of this period your personal data will be destroyed and / or deleted by the data owner.

#### 4. Categories of parties to whom the data may be communicated

The personal data provided will not be disseminated, or will not be disclosed to third parties, in any possible form, including that of their availability or simple consultation. Instead, they may be subject to communication, to well-defined individuals, in full compliance with the provisions of the law, for purposes strictly related to the execution of our contractual obligations.

In addition, your personal data may also be made available to the Judicial Authority and/ or Police, upon their specific request, for the purpose of identifying the perpetrators of any unlawful acts committed to the detriment of the Company or otherwise.

Personal data are not disclosed to undetermined recipients nor are they transmitted abroad.

The complete list of these persons or categories of persons is available at our company.

#### 5. Data Controller and DPO

The Data Controller is DESFA, based in Halandri/Greece, Messogion ave. 357-359, GR-15231

DPO (Data Protection Officer) for DESFA is Andrea Pagano.

#### 6. Rights conferred by the law to data subjects

We inform you that pursuant to art. 15-22 of the GDPR UE 2016/679, the data subject parties may exercise specific rights, by contacting the Data controller, including:

a) Right of access: the right to obtain from the Data Controller confirmation that personal data is being processed and, in this case, to obtain access to personal data and further information on the origin,

purpose, category of data processed, recipients of communication and / or data transfer, etc.

b) Right of rectification: right to obtain from the Data Controller the correction of inaccurate personal data without unjustified delay, as well as the integration of incomplete personal data, by providing an additional declaration too

c) Right to cancellation: right to obtain from the Data Controller the deletion of personal data without undue delay in the event that:

- personal data are no longer necessary with respect to the purposes of the processing;
- the consent on which the processing is based is revoked and there is no other legal ground for data processing;
- personal data have been processed unlawfully;
- personal data must be deleted to fulfil a legal obligation.

d) Right of refusal to processing: the right to object at any time to the processing of personal data that have as their legal ground a legitimate interest of the Data Controller.

e) Right to limit processing: the right to obtain from the Controller the limitation of processing, in cases where the accuracy of personal data is questioned (for the period necessary for the data controller to verify the accuracy of such personal data), if the treatment is illegal and / or data subject has refused processing.

f) Right to data portability: the right to receive personal data in a structured, commonly and automatically readable format, and to transmit such data to another data controller, only for cases where the processing is based on consent and only for data processed by electronic means.

g) Right to lodge a complaint with a supervisory authority: without prejudice to any other administrative or judicial appeal, the interested party who considers that the processing that concerns him infringe the Privacy legislation has the right to lodge a complaint with the State control authority Member in which he resides or works habitually, or the State in which the alleged infringement has occurred

In the event that the processing is based on consent, the data subjects can revoke at any time the consent given, without prejudice to the lawfulness of the processing performed before the revocation.

If the data subject party wants more information on the processing of his/her personal data, or exercise the rights previously indicated, he/she can contact the Data Protection Officer by writing an email to the following address: [dpo@desfa.gr](mailto:dpo@desfa.gr).



Place ...../...../.....(Date)

.....(Company name)

.....(Signature)