# **Privacy policy**

Autosiloport S.r.l. with registered office in Calata Ponte Mille - 16126 Genoa, e-mail: info@autosiloport.com; phone: +39 010-2758482 (hereinafter Autosiloport), pursuant to EU Regulation 679/2016 - General Data Protection Regulation ("RGPD"), recognizes the importance of personal data protection and considers its protection one of the main objectives of its activity.

Before communicating any personal data, Autosiloport invites you to carefully read this privacy policy ("Privacy Policy"), as it contains important information on the protection of personal data and on the security measures adopted to ensure confidentiality in full compliance with the RGPD. Furthermore, this Privacy Policy:

is intended only for the website http://www.autosiloport.com ("Website") while it does not apply to other websites that may be consulted through external links;

is to be intended as information provided pursuant to art. 13 and art. 14 of the RGPD to those who interact with the Website and / or who make reservations by e-mail, telephone and agency; complies with Recommendation n. 2/2001 concerning the minimum requirements for online data collection in the European Union, adopted on May 17, 2001 by the Article 29 Working Group.

Autosiloport informs you that the processing of your personal data will be based on the principles of lawfulness, correctness, transparency, purpose limitation and conservation, data minimization, accuracy, integrity and confidentiality. Your personal data will therefore be processed in accordance with the legislative provisions of the RGPD and the confidentiality obligations provided for therein.

## **INDEX**

Here below is the index of this Privacy Policy so that you can easily find information regarding the processing of your personal data.

- 1. HOLDER
- 2. PERSONAL DATA SUBJECT TO TREATMENT
- a. Navigation data
- b. Data provided voluntarily
- c. Data collected by Autosiloport
- d. Cookies and related technologies
- 3. PURPOSE, LEGAL BASIS AND OBLIGATORY OR OPTIONAL NATURE OF TREATMENT
- 4. TARGETS
- 5. TRANSFERS
- 6. DATA STORAGE
- 7. RIGHTS
- 8. MODIFICATIONS

### 1. OWNER

The Data controller is Autosiloport as defined above. For any information concerning the processing of Autosiloport's personal data, including the list of data processors, you can contact Autosiloport at info@autosiloport.com.

## 2. PERSONAL DATA SUBJECT TO TREATMENT

"Personal Data" means any information concerning an identified or identifiable natural person with particular reference to an identifier such as name, surname, license plate number, telephone number, e-mail address, an identification number, an online identifier.

The Personal Data collected are the following:

## a. Navigation data

The computer systems of the Website collect some Personal Data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with you, but by its very nature could, through processing and association with data held by third parties, allow identification. Among these are the IP addresses or domain names of the devices used to connect to the Website, the URI (Uniform Resource Identifier) 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 numeric code indicating the status of the response given by the server (success, error, etc.) and other parameters relating to your operating system and IT environment.

These data are used in order to obtain anonymous statistical information on the use of the Website and to check its correct functioning; to allow - given the architecture of the systems used - the correct supply of the various features you requested, for security reasons and to ascertain responsibility in the event of hypothetical computer crimes against the Website or third parties.

## b. Data provided voluntarily

Through the Webite, by filling out the "Reservations" form or by sending an e-mail to the address indicated, you can voluntarily provide Personal Data such as your name, surname, city, country, telephone and e-mail, the license plate and the model of your vehicle, the date of arrival and departure and the cruising company, all data necessary to reserve a parking space. Furthermore, the booking and therefore the collection of your personal data, indicated above, may also take place via telephone contact or through your Travel Agency. You can also contact Autosiloport to request information. Autosiloport will process these data in compliance with the RGPD, assuming that they are referred to you or to third parties who have expressly authorized it to provide them on the basis of an appropriate legal basis that legitimates the processing of the data in question. With respect to these hypotheses, it acts as an independent Data Controller, assuming all legal obligations and responsibilities. In this sense, it confers on the point the widest indemnity with respect to any dispute, claim, request for compensation for treatment damage, etc. that should reach Autosiloport from third parties whose Personal Data have been processed through its use of the Website in violation of the RGPD. If you are under 18 you cannot give us any personal data and you cannot book, and in any case we do not take responsibility for any false declarations you provide. If we become aware of the existence of false declarations we will proceed with the immediate cancellation of any personal data acquired.

# c. Data collected by Autosiloport

Upon your arrival at the Autosiloport parking lot, the personnel authorized to process the Personal Data will take photos of your vehicle in order to guarantee integrity throughout your stay in the parking lot. Therefore, if you find your vehicle damaged on your return, you can contact Autosiloport for assistance and be, in case, compensated.

## d. Cookies and related technologies

Autosiloport collects Personal Data through cookies. More information on the use of cookies and similar technologies is available here.

## 3. PURPOSE, LEGAL BASIS AND OBLIGATORY OR OPTIONAL NATURE OF TREATMENT

The Personal Data that you provide through the Website or through telephone contact, through the Agency or that will be collected by Autosiloport will be processed for the following purposes:

- a) purposes related to the execution of the booking service, to respond to requests for information and for customer assistance;
- b) purposes of statistical research / analysis on aggregate or anonymous data, without therefore the possibility of identifying the user, aimed at measuring the functioning of the Website, measuring traffic and assessing usability and interest;
- c) purposes related to the fulfillment of a legal obligation to which Autosiloport is subject;
- d) purposes necessary to ascertain, exercise or defend a right in judicial proceedings or whenever the judicial authorities exercise their jurisdictional functions;

The legal basis for processing Personal Data for the purposes referred to in point a) is the provision of a service that does not require consent pursuant to the RGPD, as it is based on the need to execute a contract and / or pre-contractual measures. The purpose referred to in point b) does not involve the processing of Personal Data, the purpose in point c) concerns compliance with a legal obligation, the purpose referred to in point d) represents a legitimate processing of Personal Data pursuant to the RGPD.

The provision and collection of your personal data for the purposes listed above is optional, but failure to do so will render your booking request and / or assistance and / or information impossible.

## 4. TARGET

Your Personal Data may be shared, for the purposes specified in point 3, with:

- a. subjects necessary for the provision of the services offered by the Website, including but not limited to the maintenance of the Website online, which typically act as responsible for the processing of Autosiloport;
- b. persons authorized by Autosiloport to process Personal Data that they have committed to confidentiality or have an adequate legal obligation of confidentiality; (eg Autosiloport employees and collaborators);
- c. companies or other professionals, who we turn to for professional and technical services that typically act as data controllers or autonomous data controllers (whose updated list is available at Autosiloport).
- d. courts in the performance of their duties when requested by the RGPD.

## 5. TRANSFERS

Your personal data will not be transferred to Recipients that could be found outside the European Economic Area. In any case, it is understood that the Owner, if necessary, will have the right to move the data even in non-EU countries. In this case, the Data Controller ensures from now on that the transfer of data to non-EU countries will take place in compliance with the applicable legal provisions, alternatively on an adequacy decision or after stipulation of the standard contractual clauses envisaged by the European Commission.

### 6. DATA STORAGE

Autosiloport will process your Personal Data for the time strictly necessary to achieve the purposes indicated in point 3. Therefore, Autosiloport will process the Personal Data provided and collected until you leave the car park. Without prejudice to the above, Autosiloport will process your Personal Data up to the time permitted by Italian law to protect its interests. More information about the retention period of Personal Data and the criteria used to determine this period can be requested by writing to Autosiloport.

### 7. RIGHTS

As an interested party, you have the right to ask the Data Controller for access to personal data and to correct or delete them or limit the processing that concerns them or object to the processing (articles 15 and following of the RGPD).

Requests should be sent to the Data Controller for personal data processing, Autosiloport S.r.l. with registered office in Calata Ponte Mille - 16126 Genoa, e-mail: info@autosiloport.com; phone: +39 010-2758482.

Furthermore, it has in any case the right to lodge a complaint with the competent control authority (Guarantor for the Protection of Personal Data) as provided for by art. 77 of the Regulation itself, or to take the appropriate judicial seats (Article 79 of the Regulation).

## 8. MODIFICATIONS

This Privacy Policy has been in force since March 2019. Autosiloport reserves the right to modify or simply update the content, in part or completely, also due to changes in the RGPD. Autosiloport therefore invites you to regularly visit this section to gain knowledge of the most recent and updated version of the Privacy Policy so that it is always up to date on the data collected and the use that Autosiloport makes of it.