

## Privacy Policy

This information is provided pursuant to EU Regulation 2016/679 of the European Parliament and of the Council of 04.27.2016 relating to the protection of natural persons with regard to the processing of personal data, as well as the free circulation of such data (so-called "General Regulation on processing of personal data" or "GDPR") and of Legislative Decree 06.30.2003, n. 196, as amended and integrated by Legislative Decree 10.08.2018, n. 101 ("Code regarding personal data" or "Privacy Code") by the Data Controller, i.e. the person who determines the purposes and means of the processing of personal data.

### Data controller

**Rana Diving S.p.A.**, with registered office in **Via del Trabaccolo 16, 48122 Ravenna (RA)**, tax code and VAT number **01447510395**, in the person of the legal representative *pro tempore*, in the capacity of Data Controller (hereinafter "**Data Controller**").

The Data Controller, recognizing the importance of guaranteeing the security of private information, provides the information necessary to make the employee (hereinafter "**Interested party**") aware of the characteristics and methods of processing of his personal data.

### 1. Object of the treatment

The personal data of the interested party collected within the contractual relationship between the interested party and the Data Controller may be processed.

In particular, the Data Controller may process:

- common personal data (e.g. personal data, contact details and other information of a personal nature) provided by the interested party or, in any case, acquired by Data Controller;
- only for the purpose of fulfilling obligations and exercising rights in matters of labour law and social security and protection, particular categories of personal data (e.g. data revealing trade union membership, data relating to health).

### 2. Purpose and legal basis of the processing

The personal data of the interested party or, possibly, of his family members, may be processed for purposes related to the execution and management of the employment relationship (e.g. managing the hiring process, fulfilling legal and contractual obligations, including collective, connected to the employment relationship; processing and payment of wages, etc.), as well as to fulfill the related administrative, accounting and tax obligations. The execution of a contract of which the interested party is a party or the execution of pre-contractual measures adopted at the request of the interested party pursuant to art. 6, par. 1, letter. b, GDPR, for the processing of common personal data; the need to fulfill the obligations and exercise the specific rights of the Data Controller or the Interested Party in matters of labor law and social security and social protection pursuant to art. 9, par. 2, letter. b, GDPR, for the processing of particular categories of data.

### 3. Nature of data provision

The provision of personal data by the interested party or, possibly, his family members and, in general, the processing of their personal data, is necessary to allow the Data Controller to carry out and manage the employment relationship, as well as to fulfill the relevant legal obligations; failure to provide it, therefore, could make it impossible to formalize, execute and manage the employment relationship.

#### **4. Treatment methods**

The processing of personal data is carried out using electronic and manual tools.

The processing of personal data will be based on the principles of lawfulness, correctness and transparency, purpose limitation, minimization, accuracy, conservation limitation, integrity and confidentiality and will be carried out with computerized procedures (and residually through manual or paper tools) suitable to guarantee their security and confidentiality, also through the use of suitable procedures that avoid the risk of destruction, loss, modification, unauthorized disclosure, unauthorized access to personal data transmitted, stored or, in any case, processed.

#### **5. Data retention period**

The personal data processed will be kept in compliance with the provisions of the law, for a period no longer than that necessary to achieve the purposes pursued.

As a rule, the personal data necessary for the execution and management of the contractual relationship are kept for the duration of the employment relationship and for the following 10 years, for organizational purposes, for the fulfillment of the related administrative, accounting and tax obligations. (e.g. conservation of accounting documents, archive of contractual documents for possible litigation or contractual liability), or for particular needs (e.g. defense in court).

At the end of the retention period, the personal data are destroyed or made anonymous, except for the possible conservation, in accordance with the law, of the deed or document containing them.

#### **6. Accesso, comunicazione e diffusione dei dati**

Personal data may be made accessible to workers or collaborators, expressly instructed and authorized for processing, who work employed or under the direct authority of the Data Controller.

Personal data may also be processed by third parties who carry out activities on behalf of the Data Controller (and to workers or collaborators, expressly instructed and authorized to process, who operate employed or under the direct authority of the same third parties), who demonstrate to have adopted technical and organizational measures capable of guaranteeing data security. Adequate operating instructions are provided to these third parties, expressly designated as Data Processors.

The processed personal data cannot be communicated to other specific subjects, except in cases provided for by law, such as for example to judicial authorities or other public authorities.

The processed data cannot be disclosed to undetermined subjects.

#### **7. Data transfer**

Personal data is stored in Italy or, in any case, within the European Union and the European Economic Area.

Any transfer to third countries, not belonging to the European Union or the European Economic Area, can only take place in those countries that guarantee an adequate level of protection of personal data, using methods compliant with the legislation on the protection of personal data.

#### **8. Rights of the interested party**

Pursuant to the articles 15 et seq. GDPR, the interested party has the right to:

- obtain confirmation from the Data Controller as to whether or not personal data concerning him or her are being processed and, in this case, access to personal data and other related information, including receiving a copy (right of access);
- obtain from the Data Controller the rectification of inaccurate personal data and/or the integration of incomplete personal data concerning him (right of rectification);



- in the foreseen cases, obtain from the Data Controller the cancellation of personal data (right of cancellation);
- in the foreseen cases for, obtain from the Data Controller the limitation of processing of all or part of the personal data processed by the Data Controller (right to limit processing);
- in the event that the processing is based on consent or on the execution of a contract of which the interested party is a party and is carried out automatically, request and receive from the Data Controller, in a usual electronic format, the personal data concerning him, as well as if technically feasible, transmission to another Data Controller (right of portability);
- revoke, at any time, any consent given in relation to the processing of personal data (right to withdraw consent);
- in the foreseen cases for, object, in whole or in part, to the processing of personal data (right to object);
- in the foreseen cases, not be subjected to a decision based solely on automated processing.

If the interested party believes that the data processing is in violation of the legislation on the protection of personal data, he has the right to lodge a complaint with the Italian Data Protection Authority (Garante Privacy) for the protection of personal data or, in the foreseen cases, to take action in the appropriate judicial offices.

## 9. Modalities of exercise of rights

The interested party may exercise his rights at any time by contacting the Data Controller:

**Rana Diving S.p.A.**  
**Via del Trabaccolo, 16,**  
**48122 Ravenna (RA)**

## 10. Data Protection Officer

The interested party may also exercise his rights by contacting, at any time, the Data Protection Officer (DPO), at the following email address: [studiobarbieri@mywaysec.com](mailto:studiobarbieri@mywaysec.com)

### Data Controller

Rana Diving S.p.A.