

## Information regarding the processing of personal data

Pursuant to article 13 of the Regulation (EU) 679/2016 (the “GDPR”)

This information regarding the processing of personal data (the “**Privacy Policy**”) describes the processing of personal data of the users (the “**Users**”) of Tarros’ online platform (the “**Platform**”)

### 1 Data Controller

The data controller is **Tarros S.p.A.**, with registered office in La Spezia (SP), Via Privata Enel, 19126, tax code and VAT number 00910150119 (hereinafter “**Tarros**”, the “**Company**” or the “**Data Controller**”).

For any clarification on how personal data is processed by the Company, you may contact the Company at any time at the following addresses:

- by e-mail, writing to tarros@pec.it
- by mail, at the address Via Privata Enel, 19126, La Spezia (SP).

### 2 Data Collected

Data communicated by Users: personal data for the creation of the Tarros account.

In order to access the Platform, the Users, subject to acceptance of the [Terms of Use](#), must communicate specific personal data: name, surname, e-mail (the “**Account Data**”). Such data are requested for the registration of an account that allows access to the Platform and thus enjoy the services offered by Tarros through it.

The Navigation Data and the Account Data hereinafter jointly referred to as the “**Data**”.

Cookies.

The Platform uses computer techniques for the direct acquisition of the User’s personal identification data consisting of “strings of code”: “cookies”.

For all the information on the cookies active on the Platform and the related processing of personal data, please refer to the cookie policy available on the website at the following link:

[http://www.tarros.it/wp-content/uploads/2019/10/GDPR\\_COOKIE-POLICY.pdf](http://www.tarros.it/wp-content/uploads/2019/10/GDPR_COOKIE-POLICY.pdf)

### 3 Purpose and legal basis of data processing

The **Navigation Data** will be used: (i) to monitor the proper functioning, of the Platform and services offered by Tarros, (ii) to obtain statistical information on the use of services (e.g., number of access,

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UFFICIO TRASPORTI: [trasporti.tarros@pec.it](mailto:trasporti.tarros@pec.it)

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time of access, geographical areas of origin), as well as (iii) to ensure the proper functioning of the Platform. For any further information please check the policy privacy of the website [www.tarros.it](http://www.tarros.it) available at the following link: [http://www.tarros.it/wp-content/uploads/2019/10/GDPR\\_PRIVACY-POLICY.pdf](http://www.tarros.it/wp-content/uploads/2019/10/GDPR_PRIVACY-POLICY.pdf)

The **Account Data** will be used to allow the creation of a User's account, which allows access to the Platform through which the user can enjoy the services provided by Tarros.

The **legal basis** for such processing is the **execution of the contract** executed between the User and the Company (*i.e.* the [Terms of Use](#)).

#### 4 Communication of Data

The Data may be processed mainly by Tarros employees or collaborators, under specific instructions about the purposes and methods of processing. Data collected through the Platform may also be communicated to services companies for technical and IT purposes (e.g., programmers, system engineers and database administrators, etc.).

#### 5 Place of processing and transfer abroad

The Data processing shall be made at the Company's offices and the Data shall be stored in servers located within the European Union.

Transfers of Data abroad might take place. In any case, only to third countries for which a decision of adequacy has been taken by the European Commission and which, therefore, provide adequate guarantees of personal data protection. Further transfers to countries that do not benefit from an adequacy decision of the European Commission and that, therefore, do not offer an adequate level of protection to personal data, will take place only (i) upon adoption of appropriate safeguards such as, by way of example, the signing of the standard clauses approved by the European Commission or (ii) in the event of an exception to the prohibition of transfers outside the European Union,

#### 6 Processing methods, security measures and Data retention

The Data will be processed both in paper and with electronic, computerized, and autonomous tools, through systems that ensure their protection, security, and confidentiality.

The Data Controller has also adopted specific and adequate legal, technical, logical, and organizational measures to prevent the loss of Data, unlawful or unauthorized use and/or access to them.

Data will be processed for the time strictly required to achieve the purposes for which it has been collected, as specified in paragraph 3.

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In particular, it is highlighted that the **Account Data** are retained for the whole duration of the contractual relationship between the User and Tarros.

The Data will be kept for longer periods of time where necessary to comply with statutory and/or legal obligations, as well as to ensure judicial protection of the Company's rights, in compliance with ordinary limitation periods.

## 7 Rights of the Data subject

The Users, as data subject (i.e., subjects to whom the Data refer), have the rights granted by the GDPR. In particular, they may exercise, pursuant to articles 15 to 22 of the GDPR, the right to:

- a) request from the Data Controller access to the personal data, obtain information about the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be communicated and, where possible, the storage period.
- b) request the rectification or erasure of the data and the restriction of processing.
- c) exercise the right to data portability, object to the processing, object to automated decision-making process concerning natural persons, including profiling.
- d) withdraw consent at any time, without prejudice to the lawfulness of the processing based on the consent given before the revocation.
- e) to lodge a complaint with the Data Protection Authority ([garante@gdpr.it](mailto:garante@gdpr.it) [protocollo@pec.gdpr.it](mailto:protocollo@pec.gdpr.it)).

The Data Subject may exercise his/her rights by sending a written request to the above-mentioned Data Controller.

The aforementioned rights may be exercised at any time upon request to be sent to the Data Controller at the following addresses:

- by e-mail, writing to [tarros@pec.it](mailto:tarros@pec.it)
- by mail, at the address Via Privata Enel, 19126, La Spezia (SP).

For any other information or clarification about the abovementioned rights, the User may contact the Data Controller at the same addresses.

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