

INFORMATION STATEMENT ON THE PROCESSING OF PERSONAL DATA

Pursuant to arts 13 and 14 of Regulation (EU) 2016/679 (“Regulation” or “GDPR”) and to (It.) Legislative Decree 196/2003, as amended by (It.) Legislative Decree 101/2018

1. Data controller

The data controller is Grandi Navi Veloci S.p.A., with registered office in Palermo, Calata Marinai d’Italia, tax code and VAT no. 13217910150 (hereinafter, “GNV” or the “Controller”).

The Controller may be contacted by writing to: direzione@pec.gnv.it.

The Controller has appointed a Data Protection Officer (DPO) who may be contacted for all information and requests at the following e-mail address: dpo@gnv.it.

2. Types of data

The Controller shall process the personal data concerning the Data Subject, including minors, within the limits of the law and in compliance with the GNV Transport Conditions. Such personal data includes, merely by way of example: name, surname, postal address, telephone number, tax code, e-mail address(es), identity documents, any vehicle licence plate; data such as a family ID number or large family certificate for specific departure locations or destinations where it is possible to receive discounts pursuant to the applicable local regulatory framework; IBAN, bank/postal data, credit card details, Log, IP address of origin (for services used through the GNV web portal).

When booking, sensitive data under art. 9(1) of the GDPR is not normally processed, unless such data is necessary for the correct execution of the services requested of the carrier (see, for example, passengers with reduced mobility): in this case, at the time of providing the data, a specific detailed privacy policy is provided and the data subject’s specific consent to processing is requested, pursuant to art. 9.2.a) of the GDPR.

3. Purposes of the processing

The Controller would like to provide you with information on the processing of your personal data and your rights, so that you may grant your informed consent, where required.

Your personal data (provided to us by you, by third parties or originating, within the limits of the law, from public lists) may be processed for the following purposes:

1 - the fulfilment of legal obligations, on the legal basis of art. 6.1.c) of the GDPR: that is to say, to fulfil obligations laid down by law, by a regulation, by the EU regulatory framework and by orders issued by Authorities authorised therefor by law or by competent supervisory or control Bodies (in such case, your consent is not required, as the processing of the data is linked to compliance with such obligations/provisions);

2 - the performance of contractual sale and support obligations (including the so-called “re-protection” and “code sharing” in the event of GNV communicating the data to, or receiving them from, another carrier), whose legal basis is to be found in art. 6.1.b) of the GDPR, that is to say: to fulfil obligations deriving from the contracts to which you are a party or to fulfil, before or after the stipulation of the contract, your specific requests, also with the use of remote communication techniques, among which a dedicated telephone call centre and the Customer Care support (in such case your consent is not required, since the processing of the data is material for the management of the relationship or the fulfilment of the requests); for anti-fraud activities; to use the contact details (telephone number and/or e-mail address) collected during booking or at a later stage in order to send, with the use of automated tools (e.g. by SMS, instant messaging platforms or social networks), service communications (such as the communications that may be required for the management of issues related to ongoing health emergencies and/or however aiming to facilitate passenger boarding operations);

3 - defence: to establish, exercise or defend legal claims in court proceedings, on the legal basis of articles 6.1.f) and 9.2.f) of the GDPR;

4 - *internal business analysis activities; this purpose includes all processing activities aimed at monitoring the quality of the products and services offered, with the objective of their continuous improvement, including forwarding satisfaction questionnaires to the passenger for service improvement that GNV may send, via email, at the end of the trip.*

The lawfulness of such processing derives from art. 6.1.f) GDPR: the legitimate interest in carrying out these analyses is based on the need to verify the services provided. To carry out the analyses, only the personal data

necessary and, where possible, anonymized, are processed. The data subject may always object to such processing;

- 5 - commercial or direct sales of GNV products or services similar to those you purchased: on this point, please note that the Controller may use, without your consent, the e-mail and postal addresses you have provided in the context of the sale of a product or a service. The legal basis of the processing of your data for this purpose is the legitimate interest of the Controller pursuant to art. 6.1.f) of the GDPR. In any case, pursuant to art. 21 of the GDPR, you shall have the possibility to object to such processing at any time, initially or on the occasion of subsequent communications, easily and free of charge also by writing to the Controller at the following e-mail address: dpo@gnv.it;
- 6 - the management of giveaways, on the legal basis of art. 6.1.b) of the GDPR: the provision of data is required, as, failing such provision, you will not be able to take part in the giveaway (a possible refusal shall result in the exclusion of the participant from the aforementioned procedure);
- 7 commercial: with your consent, pursuant to art. 6.1.a) of the GDPR, in order to provide you with information (also with the use of remote communication techniques, automated or otherwise, including but not limited to, correspondence by post, telephone calls also with the use of automated calling systems, telefaxe-mail, SMS or MMS messages, instant messaging platforms or social networks, or messages of another type) regarding products, services or initiatives of GNV, to promote them, to carry out market surveys and/or verify the quality of the products or services offered to you (also over the phone or by sending questionnaires), to send invitations to participate in loyalty programmes, giveaways and events. Furthermore, at the end of the trip, GNV may e-mail satisfaction questionnaires aimed at improving the service; the legal basis of the processing in question is the legitimate interest of the Data Controller, pursuant to art. 6.1.f) of the GDPR. If data subjects do not wish to receive such communications, they can object at any time by writing to dpo@gnv.it;
- 8 - profiling: with your consent, pursuant to art. 6.1.a) of the GDPR, for the analysis of your purchasing choices and your behavioural preferences, online and offline, so that we may better structure personalised communications and commercial offers, optimise our products (also through an analysis of purchases made and/or of browsing behaviour and/or of other consumption details and/or of data provided upon enrolment in the Fidelity Programme, and/or of other consumption details and/or of data provided to subscribe to the Fidelity Programme and/or to the newsletter, and/or of the responses given to market surveys), to perform general analyses for purposes of strategic orientation and business intelligence, and, in general, for profiling activities.

The provision of your personal data for the purposes under numbers 2, 6, 7 and 8 is optional. Should you refuse, there will be no consequences, except for the purpose under number 2, with regard to which failure to provide the data will make the fulfilment of the contractual sale and support obligations by the Controller impossible.

4. Fidelity Card

In the context of membership of the GNV Fidelity Programme, the data will be processed for the performance of the activities listed below:

- a) to issue the Fidelity Card and manage activities that may not be performed anonymously and that are required to make it possible for the subscribers to use and recognise discounts and promotions, to participate in the collection of points and to access the other ancillary services that may be used through the Card;
- b) to carry out, with your express written consent, direct marketing activities, such as sending - by e-mail, SMS and MMS or non-automated tools, such as paper post and operator telephone calls - advertising material and communications with informative and/or promotional content in relation to the products or services provided and/or of the Controller;
- c) to carry out, with your express written consent, individual or aggregated profiling activities and market research with the goal, for example, of analysing habits and consumption choices, processing statistics thereon or assessing the level of satisfaction with regard to the products and services offered.

For the purposes under letter a) of the previous point, the provision of data is optional, but is a necessary and indispensable condition for issuing the Fidelity Card: failure to provide the data shall, therefore, make it impossible for the applicant to obtain said Card.

For the purposes under letters b) and c) of the previous point, the provision of data is optional and any refusal

to provide such data and to grant the related consent shall make it impossible for the Controller to follow up on the direct marketing and profiling activities indicated therein, but shall not affect the applicant's ability to obtain the Fidelity Card and to access the benefits connected thereto.

5. Recipients and transfer of the data

The personal data may be disclosed to:

- personnel tasked with processing pursuant to article 29 of the GDPR;
- persons, bodies or authorities, autonomous data controllers, to which it is mandatory to disclose your personal data by virtue of legal provisions or orders of the authorities (supervisory bodies, judicial authorities, insurance companies for the provision of insurance services), including other carriers in the event of a so-called "re-protection" or "code sharing";
- persons who typically act as data processors pursuant to art. 28 of the GDPR; the complete and up-to-date list may be requested from the Data Controller, at the above addresses.

With regard to the possible transfer of the personal data to Third Countries, the Company informs you that the processing will be carried out according to one of the methods allowed by the law in force, taking into account the provisions of articles 44 to 49 of the GDPR. On request, it is possible to have further information from the Data Controller at the contact details provided above.

6. Retention and means of processing

We would like to assure you that all processing operations will be informed by the principles set forth by the GDPR, with particular regard to the lawfulness, fairness and transparency of the processing operations, the use of the data for specific, explicit, legitimate purposes, by means relevant to the processing, in compliance with the principles of data minimisation, accuracy, storage limitation, integrity and confidentiality, accountability (art. 5 of the GDPR).

The personal data shall be processed with the following operations: collection, recording, organisation, structuring, storage, consultation, adaptation or alteration, use, dissemination, disclosure by transmission, recovery, alignment, combination, restriction, erasure and destruction of the data.

The personal data shall be subject to processing both on paper and by electronic means.

The Controller will process the personal data for the time required to achieve the purposes indicated above.

7. Rights of the data subject

In your capacity as subject of the data processing in question, you shall have the following rights of information and control laid down by Regulation (EU) 2016/679:

RIGHTS OF INFORMATION	
<p>Right to the information statement art. 13-14 <i>recital 58, 60</i></p>	<p>The data subjects shall have the right to receive specific information on the processing of their personal data. The information statement must contain the following information:</p> <ul style="list-style-type: none"> • Identity of the controller; • Identity of the Data Protection Officer - DPO • Purposes of the processing • Legal basis • Any legitimate interest that constitutes the legal basis • Any legal or contractual obligations that form the basis for the provision of the data • Area of circulation of the data (EU or non-EU) • Duration of the processing • (Any) decision-making process based on automated processing • Rights of the data subject: access, rectification, completion, erasure, restriction, objection, portability, complaint with a Data Protection Authority, withdrawal of consent.

Right to access
art. 15
recital 63

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data

CONTROL RIGHTS	
<p>Right to rectification and completion art. 5 (1) (d), 16 <i>recital 39, 59, 65, 73</i></p>	<p>The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.</p> <p>Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.</p>
<p>Right to erasure and right to be forgotten art. 17 <i>recital 65-66, 68</i></p>	<p>The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the grounds of article 17 paragraph 1 of the Regulation applies.</p>
<p>Right to restriction art. 18 <i>recital 67</i></p>	<p>The data subject shall have the right to obtain from the controller restriction of processing where specific circumstances apply.</p>
<p>Right to objection art. 21 <i>recital 50, 59, 69-70, 73</i></p>	<p>The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of article 6(1), including profiling based on those provisions.</p> <p>The controller shall no longer process the personal data unless there are legitimate grounds for the processing and such grounds override the data subject's right to object.</p>
<p>Right to portability art. 20 <i>recital 68, 73</i></p>	<p>The data subject shall have the right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format from the data controller.</p> <p>The data subject shall also have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:</p> <ul style="list-style-type: none"> • the processing is based on consent pursuant to point (a) of article 6(1), or point (a) of article 9(2) or on a contract pursuant to point (b) of article 6(1); and • the processing is carried out by automated means.
<p>Right to objection and decisions based solely on the processing of data art. 21 para. 2,3 art. 22 <i>recital 70</i></p>	<p>Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such purposes, which include profiling to the extent that it is related to such direct marketing.</p> <p>The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.</p>

In your capacity as data subject, you shall also have the right to lodge a complaint with the competent Authority pursuant to art. 77 of the Regulation.

8. Procedure for exercising rights and communications

The Data Subject may send a formal request for the exercise of his/her rights or a report of alleged non-compliance or violation, by sending an e-mail to: dpo@gnv.it.

The Data Controller shall manage and fulfil the requests for exercise of the rights in compliance with the GDPR.

Please note that:

- the deadline for fulfilling the request of the Data Subject is 30 days and may be extended by an additional 60 days, if necessary, taking into account the complexity and the number of requests. In such case, the Controller shall inform the data subject of such extension and of the grounds for the delay, within 30 days from receipt of the request;
- the information provided by the data subject and any communications and actions taken shall be free of charge;
- where requests from a data subject are manifestly unfounded or excessive, in particular because

of their repetitive nature, the controller may:

- a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or
- b) refuse to act on the request.

For all clarifications or requests regarding the processing of the personal data you may contact the Data Controller or the DPO at any time, at the e-mail address indicated above.

Updated: October 2023.