Absolute S.P.A.

Via F. Petrarca 4,
29027 Podenzano (PC)
Tel: 0523354011
VAT No. 01359770334

Privacy Notice on the processing of personal data pursuant to Articles 13–14 of EU Regulation 2016/679

Data Subjects: Individuals involved in data processing for compliance with Law 231/01.

Absolute S.P.A., in its capacity as the Data Controller of your personal data, pursuant to and for the purposes of EU Regulation 2016/679 (hereinafter the 'GDPR'), hereby informs you that the aforementioned legislation provides for the protection of data subjects with regard to the processing of personal data and that such processing will be based on the principles of fairness, lawfulness, transparency and the protection of your privacy and your rights.

Your personal data will be processed in accordance with the legal provisions of the aforementioned legislation and the confidentiality obligations set out therein.

Furthermore, the Data Controller may become aware of special categories of personal data, specifically: particular categories of data that may be contained in reports, audits and minutes. The processing of personal data relating to these special categories is carried out in accordance with Article 9 of the GDPR.

Purposes and legal basis for processing: in particular, your data will be processed for the following purposes relating to the fulfilment of legal obligations:

- Adoption, implementation, updating and monitoring of the 231 Model; management of information flows to the Supervisory Body; recording of activities; management of audits and follow-up.

Methods of processing. Your personal data may be processed in the following ways:

- Paper-based methods;
- Electronic methods.

All processing is carried out in accordance with the procedures set out in Articles 6 and 32 of the GDPR and through the adoption of the appropriate security measures provided for.

Your data will be processed solely by staff expressly authorised by the Data Controller and, in particular, by the following categories of authorised staff:

- OdV – Supervisory Body.

Disclosure: your data may be disclosed to external parties for the proper management of the relationship and, in particular, to the following categories of recipients, including all duly appointed Data Processors:

- Judicial authorities;
- consultants and self-employed professionals, including those practising in a group.

Disclosure: Your personal data will not be disclosed in any way.

Retention Period. Please note that, in accordance with the principles of lawfulness, purpose limitation and data minimisation, pursuant to Article 5 of the GDPR, the retention period for your personal data is:

- set for a period not exceeding the fulfilment of legal obligations and for the purposes of defence in legal proceedings.

Data Controller: The Data Controller, in accordance with the law, is Absolute S.P.A. (Via F. Petrarca 4, 29027 Podenzano (PC), VAT No. 01359770334, which can be contacted at the following details: emailinfo.@absoluteyachts.com , telephone 0523354011) in the person of its current legal representative.

You have the right to request from the data controller the erasure (right to be forgotten), restriction, updating, rectification, data portability and objection to the processing of your personal data; furthermore, you may generally exercise all the rights provided for in Articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

EU Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 – Rights of the data subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning them exist, even if not yet recorded, to receive such data in an intelligible form, and to lodge a complaint with the supervisory authority.

2. The data subject has the right to obtain information regarding:

a. the source of the personal data;
b. the purposes and methods of processing;
c. the logic applied in the case of processing carried out with the aid of electronic means;
d. the identification details of the data controller, data processors and the designated representative pursuant to Article 5(2);
e. the persons or categories of persons to whom the personal data may be disclosed or who may become aware of it in their capacity as the designated representative within the territory of the State, data processors or persons authorised to process the data.

3. The data subject has the right to obtain:

a. the updating, rectification or, where they have an interest in doing so, the completion of the data;
b. the erasure, anonymisation or blocking of data processed in breach of the law, including data which no longer need to be retained for the purposes for which they were collected or subsequently processed;
c. confirmation that the operations referred to in points (a) and (b) have been brought to the attention, including as regards their content, of those to whom the data have been disclosed or made public, except where this proves impossible or involves a clearly disproportionate effort compared with the right being protected;
d. data portability.

4. The data subject has the right to object, in whole or in part:

a. on legitimate grounds, to the processing of personal data concerning him or her, even if such data are relevant to the purpose for which they were collected;
b. to the processing of personal data concerning them for the purposes of sending advertising or direct sales material, or for carrying out market research or commercial communications.