

**INFORMATION ON THE PROCESSING OF PERSONAL DATA OF SCHENKER ITALIANA  
S.P.A.'S POTENTIAL CLIENTS AND CLIENTS  
Pursuant to article 13 of Regulation (EU) 2016/679 (the "GDPR")**

**1. Data Controller: Schenker Italiana S.p.A.**

For the purposes set forth in this information notice (hereinafter the "**Information Notice**"), the data controller is the company Schenker Italiana S.p.A., with registered office in Peschiera Borromeo (MI), via F.lli Bandiera 29, Tax Code and VAT number 00916900152 (hereinafter 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:

- by e-mail to: [privacy.it@dbschenker.com](mailto:privacy.it@dbschenker.com)
- by the address: Schenker Italiana S.p.A. - Privacy Officer - via F.lli Bandiera 29 - 20068 Peschiera Borromeo (MI).

**2. Data Protection Officer: LCA Servizi S.r.l.**

The Company appointed LCA Servizi S.r.l. - a company with registered office in Milan, Via della Moscova 18, Tax Code and VAT Number 09299280967 - as Data Protection Officer pursuant to Articles 37 and the following of the GDPR (hereinafter "**DPO**").

The DPO may be contacted at any time by email at [dpo@lcalex.it](mailto:dpo@lcalex.it).

**3. Data collected**

In the context of business development activities aimed at the acquisition of potential clients, as well as the conclusion and execution of the related contractual relationships with the clients (hereafter, potential clients and clients are referred to as "**Data Subjects**"), the Company may collect and process the following Data Subjects' personal data:

- (i) Data Subject's first name and last name or the Data Subject's company contact person, identification document (and any additional data contained therein) (the "**Anagraphic Data**");
- (ii) company address, company e-mail and certified email, company telephone number (the "**Contact Data**"); and
- (iii) IBAN code and bank data (the "**Bank Data**");

Hereinafter, jointly referred to as the "**Data**".

The Data Subject (if not an individual) undertakes to provide this Information Notice to its employees, collaborators and, in general, company contact persons who are in contact with the Data Controller during the execution of the contract concluded with the Company.

The Data Subject is required not to disclose personal data of third parties to the Company, unless this is strictly necessary to achieve the purposes of the data processing; in this case, it is responsibility of the Data Subject to fulfil the legal requirements concerning the protection of the Data and, in particular, to inform third parties of the disclosure of their Data and to collect their consent, if necessary.

**4. Legal basis and purposes of processing**

Data will be processed:

- (i) to establish contact and assess the opportunity to establish a contractual relationship with the Data Subject. The legal basis for the processing is the performance of the contract or pre-contractual measures;
- (ii) to perform the contract concluded with the Data Subject. The legal basis for the processing is the performance of the contract or pre-contractual measures;
- (iii) for the fulfilment of legal obligations related to the execution of the contract. The legal basis for the processing is the fulfilment of a legal obligation incumbent on the Data Controller;
- (iv) to enable the Data Controller to defend itself in court in the event of disputes arising with the clients. The legal basis for data processing is the Data Controller's legitimate

interest in defending itself in court; a legitimate interest that does not cause prejudice to the Data Subjects' rights as it is necessary to guarantee the Data Controller the exercise of a constitutionally guaranteed right; and

- (v) with reference to the client's e-mail address, to enable the sending of the newsletter. The legal basis for the processing is the consent of the Data Subject.

The processing of personal Data for the purposes indicated in points (i), (ii) (iii) and (iv) above is compulsory and necessary for the proper execution of the above activities. Any refusal - partial or total - to provide Data for these purposes will make it impossible for the Data Controller to execute the contractual relationship.

The processing of Data for the purpose indicated in point (v) above is optional. Data Subjects may revoke their consent and cancel their subscription to the newsletter service at any time. Withdrawal of consent does not affect the Data processing already carried out.

#### **5. Data notification and Data recipients**

Data shall be processed by the Data Controller and the by subjects designated by the Data Controller (*e.g.* persons in charge of the IT systems management, of legal affairs, of the administrative department) may be notified to third parties only if that is necessary for the performance of the activities referred to in Paragraph 4 above.

Third party recipients of the Data, autonomous data controllers or data processors, are persons (including companies of the DB Schenker Group) who perform, on behalf and in favor of the Data Controller, tasks of technical nature (*e.g.* IT service providers), of organizational kind or professional assistance/advice and service supply (in particular, with regard to administrative/accounting and legal services, freight forwarders, carriers, banks or other payment institutions).

The full list of data processors is kept at the Data Controller's offices and may be consulted on request, to be sent to the addresses specified below in Paragraph 9 of this Information Notice. The Data will not be publicly disclosed.

#### **6. Place of Data processing**

The Data shall be processed at the Company's offices and the Data shall be stored in servers and/or archives located within the European Union or outside the European Union but exclusively in case of Data transfer to affiliated and subsidiary companies of the DB Schenker Group for purposes related to the performance of the contractual relationship with the Data Subject. Such transfer will take place only and solely in countries that guarantee personal data protection as guaranteed by the EU law or, in any case, subject to the adoption of the measures required to ensure a standard of Data protection similar to the one guaranteed within the European Union (signing of so-called Standard Clauses as set out by the European Commission, or so-called binding corporate rules).

#### **7. Data retention period**

Data will be processed both on paper and by electronic, digital or automated media, through systems ensuring their protection, security and confidentiality.

In addition, the Data Controller has adopted specific and adequate, logical, legal, organizational and technical security measures to prevent Data loss, illegal use or unauthorized use and unauthorized access.

The Data are processed only for the time strictly required to achieve the purposes for which they were collected. In particular - for the purpose specified in Paragraph 4, point (i) - the Data will be retained for 24 months after collection. The Data may be kept for a longer period if the Data Subject signs a contract with the Data Controller. In fact, for the purposes set out in Paragraph 4, points (ii), (iii) and (vi) - the Data will be kept for the entire duration of the contractual relationship and for a period of 10 years starting from the termination of the contract, according to the statute of limitations provided for by the applicable legal provisions.

The Data processed for the purpose of sending the newsletter will be kept for a maximum of 24 months from the moment of their acquisition. In any case, the Data Subject may always unsubscribe from the newsletter by means of the appropriate opt-out at the bottom of the communications transmitted. Alternatively, the Data Subjects may send a specific communication to the Data Controller, at the addresses indicated in Paragraph 9 of the Information Notice, expressing their wish to unsubscribe from the newsletter service and to delete the data held by the Data Controller.

#### **8. Rights of the Data Subject**

Data Subjects are holders of the rights granted by the GDPR. In particular, pursuant to Articles 12-23 of the GDPR, the Data Subjects are entitled to request and obtain, at any time, access to their personal data, information about the data processing, personal data rectification and/or update, erasure and restriction of processing. They are also entitled to object to processing and to request data portability (*i.e.* to receive their personal data in a structured, machine-readable, commonly used format). Finally, the Data Subjects are entitled to revoke their consent at any time (in any case shall not affect the lawfulness of the data processing made on the basis of consent given before its revocation) and to file any complaint to the supervisory authority (in Italy: the Garante per la Protezione dei Dati Personali).

#### **9. Contact data**

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

- by e-mail to: [privacy.it@dbschenker.com](mailto:privacy.it@dbschenker.com)
- by address: Schenker Italiana S.p.A. - Privacy Officer - via F.lli Bandiera 29 - 20068 Peschiera Borromeo (MI).

For further information or clarification about the rights referred to above, you may contact the Data Controller at the same addresses.