

Privacy Policy

Provided pursuant to art. 13 of EU Regulation 2016/679 and current legislation on the protection of personal data

Dear Customer,

the company Lepanto Yachting Service s.r.l., in its capacity as Data Controller of your personal data, provides this information pursuant to art. 13 of EU Regulation 2016/679 (hereinafter GDPR) and the current legislation on the protection of personal data.

1. Categories of personal data

1.1. In the context of the contractual relationship and in the pre-contractual phases, the Company may process your personal data, as provided by you:

common data: personal and contact details, bank details / IBAN code, tax data, identification data of the vessel, images of the natural person or of the legal representative of any company.

2. Purpose of processing

2.1. Your data is collected for the following purposes:

a. the fulfilment of obligations arising from a contract to which you are a party or to follow up on your specific pre-contractual requests or those arising during the execution of the contract;

b. the fulfilment of obligations arising from the law, regulations, EU and non-EU legislation, civil and tax regulations, provisions issued by authorities authorized to do so and by supervisory and control bodies;

c. the fulfilment of activities related to the economic activity of Lepanto Yachting Service s.r.l., such as customer management, with consequent acquisition of data and information even in the pre-contractual phase, the compilation of internal records and statistics, invoicing, customer-supplier accounting, orders, shipments, invoices, etc.;

d. the management of disputes, the protection of credits and the management of debts; subscription of insurance policies and any damage settlement procedures;

e. because of the legitimate interest of the Data Controller, for communications of an informative nature relating to the activity conducted, by e-mail;

f. subject to your express consent, marketing purposes, such as sending, by e-mail, communications with promotional, commercial, informative and/or advertising content in relation to services or events or initiatives promoted by the same company Lepanto Yachting Service s.r.l. and/or by the company Club House Marina Lepanto s.r.l.

g. Subject to express precautionary consent, use and storage of images and videos acquired during events, meetings and initiatives organized by the Data Controller in which you participated, with their publication, dissemination and sharing, free of charge, in any format (material or electronic), with any means (advertising, press, mass media, web and social networks) for informational and promotional purposes. It is specified, in any case, that the Data Controller uses and publishes images and videos in which the subjects filmed are not identifiable.

3. Legal basis for processing

3.1. The legal basis for processing is based, depending on the circumstances, on:

- the execution of obligations arising from the existing contract or the so-called pre-contractual ones as regards the purposes referred to in letters a) and c) of art. 2 of this information notice;
- the fulfilment of legal obligations as regards the purposes referred to in letter b) of art. 2 of this information notice;
- on the legitimate interest of the Data Controller or third parties, prevailing over the interests or fundamental rights and freedoms of the interested party, as regards letter d) of art. 2 of this information notice;
- your free and informed consent to the processing as regards letters f) and g) of art. 2 of this information notice.
- the legitimate interest of the Data Controller with reference to letter e) of art. 2 of this information notice.

4. Methods of processing

4.1. In relation to the aforementioned purposes, the processing may be carried out with manual, electronic, computerized and telematic systems and the data will be stored both on computer media and on paper media, as well as on any other type of suitable media, with logic strictly related to the purposes indicated, all in order to guarantee the security and confidentiality of the data and with the observance of every precautionary measure in full compliance with the GDPR.

4.2. The Data Controller declares to observe specific security measures aimed at guaranteeing maximum confidentiality and discretion in the maintenance of the data and in their consequent protection, thus trying to avoid risks, with respect to the data themselves, of destruction or loss, even accidental, of illicit or incorrect use, of unauthorized access or of processing not permitted or not compliant with the purpose of the collection, in harmony with the obligations set forth in the aforementioned GDPR and the legislation in force on the protection of personal data.

4.3. Only the operations necessary to achieve the purposes indicated in this privacy policy are performed on your personal data.

5. Provision of data

5.1. The provision of the requested personal data is a necessary requirement for the conclusion of the contract and to comply with all related legal, contractual, and accounting obligations. Failure to provide such data may result in the impossibility of concluding the contractual relationships or the impossibility of performing the specific services for which the provision of data is objectively indispensable.

5.2. You undertake to provide truthful, complete, and updated information and data, as well as to communicate any changes in the data and information provided, assuming all responsibility in the event of any false declarations or incomplete or incorrect indication of the data.

5.3. Consent to the sending of communications with promotional, commercial, informative and/or advertising content in relation to products and/or services or events or initiatives is optional.

5.4. The owner uses the contact details of customers for occasional communications of an informative nature. The owner's interest is legitimate as it is limited to the email address and related to events or situations of particular importance. The data is kept confidential and is not transferred, communicated, disseminated, or made available to third parties, not even anonymously. The interested party may at any time communicate that he or she is no longer available to receive communications.

6. Communication of data

6.1. Your data will be processed by specifically authorized, instructed, trained, informed and appointed subjects within the company structure (employees and collaborators), each according to their duties.

6.2. Lepanto Yachting Service s.r.l. declares that, in order to carry out its business, in consideration of its organizational structure and the services provided, it uses, in addition to its own employees, entities, companies, consultants, freelancers, law firms, insurance companies, IT equipment maintenance companies or in any case external subjects, appointed by the Data Controller through an act of appointment as external manager where necessary or appropriate.

6.3. Your data may also be communicated to public or control bodies in compliance with specific provisions of law, as well as in the event of inspections and checks, or by direct order of the Judicial Authority; all as independent data controllers (INPS, Ministries, Financial Administration; Revenue Agency, Judicial Authorities, etc.).

7. Data storage

7.1. Your personal data will be stored at the Data Controller's headquarters as well as at the branch office in Verona.

7.2. The data is stored for the period necessary to fulfil the contract in place between the parties or to conduct the activity and in any case for the period required by applicable law (for example 10 years for contractual/fiscal documentation), except for a legitimate interest of the Data Controller. Limited to the newsletter service, the Data Controller indicates a storage period of 2 years, to be calculated from the sending of the last communication forwarded; without prejudice, for the interested party, to the possibility of objecting at any time to the processing in cases where consent has been given, with the methods indicated below. The request to cancel the subscription to the newsletter service can be made by the user by sending an email with the word "cancellami" to the email address marinalepanto@legalmail.it. as indicated at the bottom of each email received.

8. Profiling

8.1. Your personal data are not subject to any fully automated decision-making process, nor profiled. Only limited to images and videos, there may be a dissemination.

9. Transfer of data abroad

9.1. Personal data is not transferred to third countries or to international organizations outside the European Union. Only for the publication and dissemination of images, depending on the systems adopted, there may be a transfer outside the EU. In this case, what is already set out in art. 2 letter g is highlighted.

10. Data Controller

10.1. The Data Controller is Lepanto Yachting Service s.r.l., with registered office in Monfalcone (34074-GO), Via Consiglio D'Europa n. 38, Tel: 0481.45555 Fax: 0481 44082 E-mail: e-mail.marinalepanto@legalmail.it.

11. Rights of interested parties pursuant to EU Regulation 2016/679

11.1. The interested party has the right: a. to access, rectification, erasure, limitation and opposition to the processing of data; b. to obtain without

impediments from the data controller the data in a structured format of common use and readable by automatic device to transmit them to another data controller;
c. to revoke the consent to the processing, if given, without prejudice to the lawfulness of the processing based on the consent acquired before the revocation;
d. to lodge a complaint with the Authority for the Protection of Personal Data if you believe that your rights have been violated.

11.2. The exercise of the rights can be exercised by sending an email to the email address marinalepanto@legalmail.it. with the subject "Exercise of Privacy Rights" or by written communication to be sent to the Data Controller:

Lepanto Yachting Service s.r.l.

Via Consiglio d'Europa n. 38 - 34074 Monfalcone (GO)

Tel: 048145555 Fax: 0481 44082 e-mail: marinalepanto@legalmail.it

On the website www.marinalepanto.it, on the "Privacy Policy" page, any changes and updates to this information may be indicated. We therefore ask you to conduct periodic checks, before providing any new personal data.

Monfalcone, 09/12/2024