

PRIVACY POLICY ACCORDING TO ARTICLE 13 LEGISLATIVE DECREE 196/2003 (PRIVACY CODE) AND ARTT. 13 EU REGULATION 2016/679 (GDPR)

Data Subjects: Costumers.

Dear Customer,

this information is provided by Maxcom Bunker S.p.A., with registered office at Via Adolfo Ravà 49, 00142 Rome, in its capacity as Data Controller (hereinafter the "Controller" and/or the "Company"), pursuant to and for the purposes of the Legislative Decree 30 June 2003 no. 196 (hereinafter 'Privacy Code'), and Articles 13 and 14 of EU General Data Protection Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data (hereinafter, the 'GDPR').

We illustrate below the purposes and methods by which the Company collects and processes your personal data, which categories of data are subject to processing, the rights that you can exercise as a data subject and how to exercise them.

1. What personal data is processed?

The Company will process the personal data you provide at the time of conclusion of the contract for the provision of services activated by you and, under the conditions indicated below, some personal data that may be acquired during the contractual relationship, and specifically:

- i) Personal data (name, surname, age, sex), address of residence or domicile and contact details (telephone, e-mail address);
- (ii) Bank and/or payment details;
- iii) Data relating to your degree of solvency and your punctuality in payments, also acquired through information systems of authorized companies that provide services for credit risk management and fraud control.

2. Purpose and legal basis of the processing.

Your personal data will be processed for the purposes indicated below:

(a) performance of the contract.

Your personal data will be processed for the establishment, management and execution of the contractual relationship (by way of example, for the billing of fees, for the management of payments or complaints that may be forwarded) and for the provision of services requested by you. In particular, the Company may process for this purpose the data indicated in points i), ii), iii) of the aforementioned Article 1.

We inform you that the processing of functional data for the execution of the contract is necessary for the establishment, management and execution of the contractual relationship and their conferment is required to implement the purpose in question. The processing of data for this purpose **does not require** your consent as it is necessary for the execution of a contract, according to Article 6, par. 1, letter b), of the GDPR. The Controller also informs that any failure to communicate, or incorrect communication of one of the mandatory information, may make it impossible to establish, manage and implement the contractual relationship with the Company.

(b) fulfilling legal obligations.

Your personal data will be processed by the Company for the fulfillment of legal obligations. In particular, the Company may process your data for the fulfilment of obligations deriving from services carried out under concession, as well as accounting and tax obligations and for the fulfilment of provisions issued by the Authority. For this purpose, the data indicated in points i), ii) iii) of the aforementioned Article 1 may be processed.

We inform you that the processing of functional data for the fulfillment of legal obligations is necessary for the establishment, management and execution of the contractual relationship and their conferment is mandatory to implement the above-mentioned purpose. The processing of data for the above purposes **does not require** your consent as it is necessary to comply with the legal obligations to which the Company is subject, pursuant to Articles 6, par. 1, letter c) and 9, par. 2, letter b) and f) of the GDPR. The Controller also informs that any failure to communicate, or incorrect communication of one of the mandatory information, may make it impossible to establish, manage and implement the contractual relationship with the Company.

3. To which categories of third parties may your personal data be communicated?

For the execution of the contract and the fulfillment of legal obligations, administrative and accounting purposes, and on the basis of the legitimate interest of the Company, the Controller may disclose your personal data to the following categories of subjects:

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-subsidiaries companies;

-subjects that carry out services of acquisition, processing and elaboration of the data necessary for the fruition of the services for the customers;

-persons providing services for the management of the Company's information system;

-parties involved in the transmission, enveloping, transporting and sorting of the communications of the person concerned;

-subjects that carry out archiving and data entry activities;

-persons who carry out control, audit and certification activities carried out by the Company also in the interest of its clients and users;

-subjects that carry out archiving and data entry activities;

-persons who carry out control, audit and certification activities carried out by the Company also in the interest of its clients and users;

-entities managing the Credit Information System;

-assignee companies of a claim;

-persons who carry out technical and organizational tasks on behalf of the Company;

-sales agents, studies and companies in the context of assistance and consultancy relationships;

-public authorities, when the conditions are met.

These subjects will process the data, depending on the case, in their capacity either as autonomous Controllers or Processors pursuant to Article 28 of the GDPR on behalf of the Company.

You can request the list of data processors by writing to Maxcom Bunker S.p.a., Via Adolfo Ravà n° 49 - 00142 Rome, or by writing to the email address privacy@maxcombunker.com

4. **How are personal data processed?**

All your data is collected and recorded lawfully and correctly for the purposes indicated above and is processed, even with the help of electronic or automated means and special databases, in terms not incompatible with these purposes and, in any case, in such a way as to ensure the security and confidentiality of the data.

5. **Duration of treatment and storage period.**

Your data will be processed only for the time necessary for the purposes mentioned above.

In particular, we report below the main periods of use and storage of your personal data with reference to the different purposes of processing:

a) the data processed for the execution of the contract will be kept by the Company for the entire duration of the contract and, according to Article 2220 of the Italian Civil Code, for a period of 10 years following the termination of the contract, unless there is a need for further storage to allow the Company to defend its rights;

b) the data processed for the fulfillment of legal obligations will be kept by the Company within the limits provided for by law and as long as the need for processing to fulfil these legal obligations persists.

6. **Which are the rights that can be exercised by the interested parties?**

6.1 Rights of access, deletion, restriction and portability.

Data subjects are entitled to the rights referred to in Articles 15, 16, 17, 18, 19, 20, 21 of the GDPR. By way of example, any interested party may:

(a) obtain confirmation as to whether or not personal data relating to him are being processed;

(b) where processing is ongoing, to obtain access to personal data and information relating to the processing and to request a copy of the personal data;

(c) rectify inaccurate personal data and integrate incomplete personal data;

(d) to obtain the erasure of personal data concerning him;

(e) to obtain the limitation of processing;

(f) receive their personal data in a structured format that is commonly used and machine-readable, and request their transmission to another controller if technically feasible.

6.2 Right to object.

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Every interested party has the right to object at any time to the processing of his/her personal data carried out for the purpose of pursuing a legitimate interest of the Controller. In the event of opposition, your personal data will no longer be processed, unless there are legitimate reasons to carry out the processing that prevail over the interests, rights and freedoms of the data subject or for ascertaining, exercising or defending a right in court.

6.3 Right to withdraw consent.

In the event that consent is required for the processing of personal data, each interested party may, at any time, may withdraw the consent already given, without prejudice to the lawfulness of the processing based on consent given before the revocation. In order to withdraw the consent, each interested party may write an email to privacy@maxcombunker.com

6.4 Right to lodge a complain with the Authority.

In addition, any interested party may lodge a complaint with the Authority for the Protection of Personal Data in the event that he or she believes that his or her rights under the Privacy Policy have been violated, in accordance with the procedures indicated on the Authority's website accessible at: www.garanteprivacy.it.

The exercise of the rights shall be free of charge.

For further information, please consult article 7 of the Privacy Code on the Authority's official website at www.garanteprivacy.it, while articles 15 to 23 of the GDPR can be consulted at: <http://eur-lex.europa.eu/legal-content/IT/TXT/HTML/?uri=CELEX:32016R0679&from=EN>.

7 Controller.

The Controller is Maxcom Bunker S.p.a., Via Adolfo Ravà n° 49 - 00142 Rome; e-mail: privacy@maxcombunker.com; telephone: 010.56051, in the person of its legal representative pro tempore.

8 Data Protection Officer (DPO).

The Data Protection Officer (DPO) is Avv. Ezio Zani, e-mail: rpd@maxcombunker.com

You will also be able to view the updated version of this information at any time by visiting the Internet address <http://www.maxcombunker.com/privacy/informativa>.