

**PRIVACY GDPR ORGANIZATIONAL MODEL****“VISITORS ACCESS LOG” ADVISORY  
EX ART. 13 GDPR**Sheet 1 of 5  
Date 24/10/2022  
Revision 00**ADVISORY**

in accordance with Art. 13 of (EU) Regulation 2016/679 of the European Parliament and the Council of 27 April 2016

In accordance with article 13 of the General Data Protection Regulation – (EU) Regulation 2016/679 of the European Parliament and the Council of 27 April 2016 with regard to the protection of physical persons concerning the processing of personal data, as well as the free movement of said data (hereinafter called “**GDPR**”), we endeavour to provide you with some information regarding the processing of your personal data provided in the case of access to the Cereal Docks S.p.A. facilities.

**Data processing controller**

The Data Processing Controller is **Cereal Docks S.p.A.**, with registered offices in Camisano Vicentino (VI), Via dell’Innovazione No. 1, taxpayer’s code and registration number in the Vicenza Companies Registry: 02218040240 (hereinafter also called “**Controller**” or “**Company**”).


**Data Protection Officer (hereinafter called “DPO”)**

The Controller relies on the group DPO appointed in accordance with Art. 37, paragraph 2 of the GDPR. The DPO’s contact information can be found on the Controller’s website or at their headquarters. To exercise your rights and for any communication, problems and/or requests for clarification concerning the protection of your personal data, feel free to contact the DPO.

**Compulsory purposes for which the processing does not require your consent**

| <b>Purpose</b>   | <b>Legal base of the processing</b>   |
|--|---|
| Monitoring and recording visitor access to company facilities    | (Art. 6, paragraph 1, subsection c), GDPR)<br>Processing necessary to fulfil a legal obligation to which the Controller is subject (also in relation to Legislative Decree No. 81/2008 and Ministerial Decree 3.9.2021 - General criteria of design, execution, and exercising fire safety for workplaces)<br>(Art. 6, paragraph 1, subsection f), GDPR)<br>Processing is necessary for the purposes of the legitimate interests pursued by the Controller connected with needs of protecting the safety of people and the security of company property<br>(Art. 6, paragraph 1, subsection f), GDPR)<br>Processing necessary to pursue the legitimate interest of the Controller connected with the implementation of certified quality management systems for food defence purposes |
| Monitoring and recording visitor access to the company cafeteria | (Art. 6, paragraph 1, subsection f), GDPR)<br>Processing necessary for the purposes of the legitimate interests pursued by the Controller connected with administrative/accounting needs  |
| Statistics processing in aggregate form                          | (Art. 6, paragraph 1, subsection f), GDPR)  |

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[www.cerealdocks.it](http://www.cerealdocks.it)

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|  | Processing necessary for the purposes of the legitimate interests pursued by the Controller |
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### **Personal data recipients**

In order to pursue the purposes indicated above, your personal data may be communicated to:

- employees and/or staff of the Controller, duly appointed as authorised subjects and instructed on the processing methods of said data;
- other companies in the ‘Cereal Docks’ Group for the management of specific functions and/or services;
- third parties other than the Controller, such as:

| <b>Third parties or categories</b>   | <b>Purpose</b>  | <b>Notes</b>  |
|--|---|---|
| Information technology companies   | Management, maintenance, updating of the systems and software used by the Controller  |   |
| Providers of networks, electronic communication services, and information technology and telematic services of data archival, storage and management | Hosting, housing, Cloud, SaaS, and other remote digital services indispensable for distributing the Controller’s operations; archival and storage services of electronic documents in accordance with regulations | Cloud services could imply data processing in countries outside the EU which guarantee suitable confidentiality rights. |
| Consultants, professionals, law firms, arbiters, insurance companies, experts, brokers.  | Legal activity, extra-legal activity, insurance activity in the case of claims<br>Organisational, administrative, financial, and accounting management  |   |
| Consultants and professionals; business partners and their delegates   | Audits of the Quality Management System – Food defence procedures   |   |
| Local Governments and Public Bodies in general   | Management of requests by monitoring agencies<br>Fulfilment of legal obligations  |   |
| Public Safety Authority and Judicial Authority   | Management of investigations by investigative bodies in the case of claims  |   |

The Cereal Docks Group companies and third parties to whom your personal data may be communicated act as:

- data procession controllers, in other words, subjects who determine the purposes and the means of processing personal data;
- processing managers, in other words, subjects who process personal data on behalf of the Controller;
- data processing co-controllers who determine the purposes and the means of the same jointly with the Company.

The list and the updated information of the subjects identified as controllers, managers, or co-controllers are available at the Company.


### **Storage period of the personal data**

#### **CEREAL DOCKS SPA Benefit Company**

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Below, we will illustrate the storage period of the personal data or, if it is not possible, the criteria used to determine said period.

| Personal data and documents   | Storage period or criteria to determine it   |
|---|--|
| Personal data (and date and time of entry/exit, company they belong to) in relation to the purposes of monitoring and recording visitor access to company facilities, monitoring and recording visitor access to company facilities for food defence purposes, monitoring and recording visitor access to the company cafeteria | For the duration necessary for pursuing the purposes of the processing and, in any case, for a period not greater than one year, save for needs to protect the rights of the Controller. |

### **The interested party's rights**


We hereby inform you of the existence of some rights set forth in the GDPR with regard to personal data and the relevant processing which you may request of the Controller.

| Right  | Description  | Method to render it effective   |
|--|--|---|
| Right of access by the data subject (Article 15) | <p>You may request: a) the purpose of processing; b) the categories of personal data in question; c) the recipients or the categories of recipients to whom the personal data has been or will be communicated, in particular if they are recipients from third-party countries or international organisations; d) when possible, the anticipated period of storage of the personal data or, if it is not possible, the criteria used to determine said period; e) the existence of the right of the interested party to ask the data processing controller to rectify or delete personal data or limit the processing of their personal data or oppose to its processing; f) the right to file a complaint with the monitoring authority; g) should the data not be collected from the interested party, all the available information concerning its origin; h) the existence of an automated decisional process, including the profile pursuant to article 22, paragraphs 1 and 4 and, at least in these cases, significant information on the logic used, as well as the importance and the consequences anticipated by said processing for the interested party.</p> <p>You have the right to request a copy of the personal data being processed</p> | Forms on the website or available from the Data Processing Controller |
| Right to rectification (Article 16)              | You have the right to request the rectification of incorrect personal data concerning you and to obtain the integration of incomplete personal data  | Forms on the website or available from the Data Processing Controller |

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| Right to be forgotten (Article 17)                                   | You have the right to obtain the cancellation of your personal data from the Controller if the personal data is no longer necessary with respect to the purposes for which it was collected or otherwise processed   | Forms on the website or available from the Data Processing Controller |
| Right to restriction of processing (Article 18)                      | You have the right to obtain from the Controller the restriction of the processing when you have ascertained the inaccuracy of the personal data (for the period the Controller needs to verify the inaccuracy of said personal data) or if the processing is unlawful, but you oppose the cancellation of the personal data and request instead that its use be limited or if they are necessary for the ascertainment, exercising, or defence of a right in court, whereas they are no longer needed by the Controller.                    | Forms on the website or available from the Data Processing Controller |
| Right to portability (Art. 20)                                       | You have the right to receive, in a structured, commonly used format legible from an automatic device, your personal data provided to us and you have the right to transmit it to another controller if the processing: (i) is based on consent, (ii) on the contract, and (iii) if the processing is carried out with automated means, unless the processing is necessary to execute a task of public interest or connected to the exercising of public powers and that said transmission does not infringe on the rights of a third party. | Forms on the website or available from the Data Processing Controller |
| Right to object (Article 21)   | You have the right at any time to oppose, entirely or partially, to the processing of your personal data should the processing be carried out to pursue a legitimate interest of the Controller, in other words, should the processing be carried out for direct marketing purposes. In this case, the personal data will no longer be processed for these purposes.   | Forms on the website or available from the Data Processing Controller |
| Right to lodge a complaint with a supervising authority (Article 77) | You have the right to lodge a complaint with the supervising authority should you believe that the processing concerning you violates the GDPR.  |   |

Exercising the aforementioned rights is subordinate to the limits, regulations, and procedures set forth by the GDPR and which the interested party must know and enact. Moreover, in accordance with the provisions of article 12, paragraph 3, the Controller will provide the interested party with the information regarding the action taken without unjustified delay and, in any case, no later than one month from receiving the request. This term will be extended by two months, if necessary, taking into account the complexity and the number of requests. The Data Processing Controller informs the interested party of said extension and the reasons for the delay within one month of receiving the request.

### **Changes and amendments**

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This advisory may be subject to changes and/or integration, including as a consequence of the applicability of the GDPR and any future regulatory changes and/or amendments.

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The personal data provided may be processed by the Controller with and without the aid of digital instruments.

Furthermore, we hereby inform you that the communication of your personal data for the compulsory purposes indicated is a legal or contractual obligation or a necessary requirement in order to carry out contractual obligations, therefore you must provide the personal data because otherwise the relationship with the Company cannot be managed.