

Privacy Policy

This policy is provided, pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter "GDPR"), to those who connect to the website ("www.circlegroup.eu") owned by CIRCLE S.p.A., parent company of the CIRCLE Group, an Italian corporate group operating in the digitalization of the logistics and port supply chain, or to those who voluntarily provide personal information at events and trade fairs in which Circle SpA participates.

It is intended to describe the processing of personal data of users who provide personal information (e.g., business cards) and consult the Site and/or use the features and services made accessible through the Site, such as, but not limited to, the purchase of goods and services, participation in discussion forums, etc.

This policy is provided only for the Site and for other sites owned by CIRCLE S.p.A.

Users are encouraged to read this policy carefully before submitting/providing any personal information and/or completing any electronic/computerized forms (management software, accounting software, etc.) on the Site or any paper forms (registration forms, order forms, etc.) available on-site at events/trade fairs/seminars.

TYPES OF DATA PROCESSED

CIRCLE S.p.A., as part of its business activities and the relationship between us, may collect the following types of personal and business data:

- Personal data: First name, Surname, Date of Birth, Tax ID, VAT number, Company name, Job title, Role, Position, and similar;
- Contact information: Residential, domicile, or workplace addresses, Telephone numbers, Email or certified email addresses, and similar;
- Accounting data: Tax data, Banking information, Payment information, and similar;
- Other personal data voluntarily provided by users during registration.

The website www.circlegroup.eu is accessible to everyone without the need to log in with credentials and personal data.

1.1 Browsing Data

The computer systems and software procedures used to operate the Website (www.circlegroup.eu) automatically acquire, during their normal operation, certain data from the browser used, which is then implicitly transmitted when using Internet communication protocols.

This category of data includes, for example, IP addresses, the domain names of computers used by users connecting to the Website, the URI (Uniform Resource Identifier) addresses of requested resources, the time of the server request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the server response, and other parameters relating to the user's operating system and IT environment.

This information is not collected in order to be associated with identified data subjects and may be used by CIRCLE S.p.A. to obtain anonymous statistical information on the use of the Website and to monitor its proper functioning.

This information may also be used to ascertain liability in the event of hypothetical computer crimes against the Site.

1.2 Cookies

The Site uses cookies. Users are advised to carefully read the relevant cookie policy.

1.3 Personal data provided by users

CIRCLE S.p.A. also collects personal data entered by users in registration forms or otherwise voluntarily provided by users, for example, to participate in events, trade shows, or seminars organized by CIRCLE S.p.A. or to request goods or services offered through the Site.

2. PURPOSE OF DATA PROCESSING

Your personal data is collected to provide the following services:

Without the need for your express consent (Article 6, letters b), e) of the GDPR), for the following Service Purposes:

- (a) to conclude contracts for the Data Controller's services;
- (b) to fulfill pre-contractual, contractual, and tax obligations arising from existing relationships with you;
- (c) to fulfill obligations established by law, regulation, EU legislation, or by an order of a judicial authority (such as anti-money laundering);
- (d) to exercise the Data Controller's rights, such as the right to defense in court.

With the need for your specific express consent (Article 6, letters a) of the GDPR), for the following purposes:

- (e) to send you commercial communications relating to events, trade fairs, seminars, and workshops for which you may be entitled to participate;

3. PROCESSING METHODS

Personal data will be processed in full compliance with the principles of confidentiality, fairness, necessity, relevance, lawfulness, and transparency established by the GDPR.

Personal data will be processed primarily using electronic means, using methods strictly related to the purposes for which they are processed, and in any case in a manner that guarantees the confidentiality and security of personal data in accordance with applicable regulations. Appropriate security measures will be implemented to prevent the accidental destruction or loss of personal data, unlawful or improper use, or unauthorized access or processing.

The personal data collected is processed at the Data Controller's headquarters in Italy, Piazza Borgo Pila 40 (Tower A, extension 46), 16129 Genoa.

Personal data is processed by internal personnel of the Data Controller (employees, collaborators, System Administrator) who are identified and authorized to process data and duly trained in compliance with privacy and data security regulations.

Personal data may also be processed on behalf of the Data Controller by (external) Data Processors specifically designated pursuant to Article 28 of the GDPR.

Data storage and archiving takes place at the Data Controller's headquarters in the Administrative Office, the designated storage location.

No third-party provider has access to the data unless specifically required by law to fulfill the indicated purposes.

4. MANDATORY OR OPTIONAL NATURE OF DATA PROVISION AND CONSEQUENCES OF REFUSAL

Personal data will be processed in full compliance with the principles of confidentiality, fairness, necessity, relevance, lawfulness, and transparency established by the GDPR.

Providing data for the purposes set out in the previous section (2 a, b, c, d) is mandatory as it is intended to process requests from the data subject and/or to conclude and execute contracts with the data subject. Failure to provide the data and/or express refusal to provide the data will make it impossible for the data controller to fulfill its contractual obligations or comply with instructions issued by the competent authorities.

Providing personal data for marketing purposes, as set out in the previous section (2 e), is optional and the related processing can only take place with the user's express consent; Therefore, you may decide not to provide your consent, or to withdraw it at any time. Failure to provide personal data for these purposes does not prevent the user from accessing the various areas of the Site or participating in the initiative/competition in which they are interested, or from receiving information or the provision of the requested goods and/or services.

5. SCOPE OF DATA COMMUNICATION AND DISSEMINATION

In order to achieve the purposes set out in point 2 above and to the extent strictly necessary, the user's personal data may be disclosed to employees, collaborators, and/or agents of CIRCLE S.p.A., who are authorized to process data for this purpose and/or appointed as data processors, in accordance with and within the limits of their assigned duties and responsibilities.

Furthermore, the user's personal data may be disclosed and/or disclosed and/or made accessible to third parties pursuant to art. 15) of the GDPR to the following parties who perform activities related to, instrumental to, and/or supporting the activities of CIRCLE

S.p.A. and to whom CIRCLE may turn – after having been appointed as data processors – to carry out the aforementioned activities, to the extent strictly necessary and in compliance with the purposes set out in point 2 above:

- (i) managers and administrators of the IT system used by CIRCLE S.p.A.;
- (ii) persons who manage and/or process CIRCLE S.p.A.'s databases;
- (iii) persons who collect purchase orders for goods and services from users;
- (iv) persons who provide assistance and consulting services to CIRCLE S.p.A. in administrative, accounting, tax, and legal matters;
- (v) persons who provide assistance and consulting services to CIRCLE

S.p.A. in marketing matters;

(vi) persons who provide logistics, shipping, and transportation services to CIRCLE S.p.A.;

(vii) persons who are granted access to the user's personal data by law, regulation, and/or EU legislation;

(viii) third parties (e.g., sponsors, partners) exclusively for purposes related to sponsorship and promotion;

The updated list of Data Processors and authorized persons is kept at the Data Controller's administrative headquarters and can be provided upon request by the Data Subject by sending an email to the following address: dpo@circletouch.eu

If you decide to give your consent to the use of your personal data for the purposes set out in the previous section (2 e), your data may be made accessible to the parties indicated in the previous points (VIII), specifically to third-party companies operating in the publishing sector and to companies operating in the following sectors with which CIRCLE S.p.A. may enter into partnership agreements: social networking platforms and interactive platforms, consumer goods, distribution, finance, insurance, automotive, services, and humanitarian and charitable organizations, as well as telecommunications, for commercial and/or promotional purposes.

Your personal data will not be disclosed to other parties not involved in the processing.

6. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

Any transfer of data to non-EU countries will be carried out in accordance with the provisions of Chapter V of the GDPR (Articles 44 et seq.), selecting service providers from those who provide adequate guarantees and subject to the stipulation of the standard contractual clauses provided by the European Commission.

7. DATA CONTROLLER

The data controller is CIRCLE S.p.A., with registered office at Via Giovanni Battista Pergolesi 26, 20124 Milan, ITALY, VAT and tax code, and registered with the Milan Register of Companies.

07869320965, Economic and Administrative Index (REA) No. 1987108, and administrative headquarters at Piazza Borgo Pila 40/46, 16129 Genoa.

8. DATA SUBJECT RIGHTS

In relation to the processing of your personal data, you have the right to ask CIRCLE S.p.A.:

- access: you can request confirmation as to whether data concerning you is being processed, and to know its origin, methods, and purposes, as well as further clarification regarding the information in this Policy, as well as to receive the data itself, within reasonable limits;
- rectification: you can request that the data you have provided us or otherwise in our possession be rectified or supplemented if it is inaccurate;
- erasure: you can request that your data acquired or processed by CIRCLE S.p.A. be erased if it is no longer necessary for our purposes or if there are no outstanding disputes or controversies, if you withdraw your consent or object to the processing, if the processing is unlawful, or if there is a legal obligation to erase it;

- **Restriction:** You may request the restriction of the processing of your personal data when one of the conditions set out in Article 18 of the GDPR applies; in this case, your data will not be processed, except for storage, without your consent, except as explicitly stated in the same Article, paragraph 2.
- **Objection:** You may object at any time to the processing of your data based on our legitimate interest, unless we have legitimate grounds for processing that override yours, for example, for the exercise or defense of legal claims. Your objection will always prevail over our legitimate interest in processing your data for marketing purposes;
- **Portability:** You may request to receive your data, or to have it transmitted to another controller indicated by you, in a structured, commonly used, and machine-readable format. Furthermore, pursuant to Article 7, paragraph 1, GDPR, you may object to the processing of your data at any time. 3, GDPR, we inform you that you may exercise your right to withdraw your consent at any time, without affecting the lawfulness of processing based on your prior consent.

We also inform you that you have the right to lodge a complaint with the Supervisory Authority, which in Italy is the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali).

9. APPOINTMENT OF THE DPO (Data Protection Officer)

The Data Controller has appointed a Data Protection Officer (DPO), Mr Daniele Colombo, who can be contacted by data subjects to exercise their right to rectification, updating, or deletion of their data, by emailing dpo@circletouch.eu

10. GUARANTOR

If you believe that your personal data has not been handled appropriately in accordance with the law, please submit a complaint to the Supervisory Authority:

Garante per la protezione dei dati personali (Public Relations Office – URP; address: Piazza Venezia 11 scala B – 00187 – ROME, Italy; Tel.: +39 06.69677.2917; Email: urp@gpdp.it, garante@gpdp.it; Certified email: protocollo@pec.gpdp.it).

To read the information online, please visit the website at: <https://www.circlegroup.eu/it/cookie-policy/>