

NOTICE PURSUANT TO ARTICLE 13 OF EU REGULATION NO. 2016/679
– MANAGEMENT, ANALYSIS AND UPDATING OF THE MODEL PURSUANT TO LEGISLATIVE DECREE NO. 231/2001 –

SNATT LOGISTICA S.p.A., (Tax Code and VAT No.: 02060420359) (hereinafter “SNATT”), in the person of its pro tempore legal representative, with registered office in Campegine (RE), Via Kennedy, 20, in its capacity as Data Controller pursuant to Articles 4(7) and 24 of EU Regulation No. 2016/679 (GDPR), hereby informs you, pursuant to Article 13 of the GDPR, that the personal data described in Article 1 will be processed by SNATT for the purposes of processing set out in Article 2.

1. Categories of personal data subject to processing.

1.1. SNATT collects and processes, for the purpose of pursuing the processing purpose described in Article 2, only that information which is necessary, essential and relevant for the management, maintenance, analysis and updating of the current model adopted pursuant to Legislative Decree No. 231/2001; such information consists, primarily of personal data pursuant to Article 4(1) of the GDPR, and, where applicable, of so-called special categories of personal data pursuant to Article 9(1) of the GDPR and/or so-called criminal records pursuant to Article 10 of the GDPR (hereinafter simply “information”).

2. Purposes of processing and legal basis.

2.1. The information is processed by SNATT for the following processing purpose:

- a. Management, maintenance, analysis and updating of the current model pursuant to Legislative Decree No. 231/2001, including the possible application of the disciplinary system and the possible exercise, protection or defence of a right, including in court proceedings.

In accordance with Article 13(1)(d) of the GDPR, SNATT specifies that the legitimate interest underpinning the legal basis for the processing purpose referred to in Article 2.1. (a), consists precisely in the management, maintenance, analysis and updating of the current model pursuant to Legislative Decree No. 231/2001, including the consequent ancillary and/or incidental activities described above. In this regard, SNATT specifies that the legal basis for the purpose referred to in Article 2.1(a) is found in the following regulatory provisions: Article 6(1)(f) of the GDPR, for personal data; Article 9(2)(f) of the GDPR, for any so-called special categories of personal data; Article 10 of the GDPR, for any so-called criminal records data.

3. Retention period.

3.1. In accordance with Article 13(2)(e) of the GDPR, SNATT hereby sets out the following retention periods/criteria, at the end of which the information processed for the purpose of processing referred to in Article 2.1. point (a), may be subject to erasure, destruction or anonymisation: (i) for the fulfilment of the processing purpose referred to in Article 2.1. point (a): as a rule, for the duration of the validity and effectiveness of the current model adopted pursuant to Legislative Decree No. 231/2001; in the event of legal and/or disciplinary proceedings, until the conclusion of the relevant proceedings and the expiry of the relevant time limits for any appeal, a time limit which may be extended in order to comply with a regulatory obligation (including one that has arisen subsequently) or to assert or defend a right, including in court.

4. Recipients.

4.1. In accordance with Article 13(1)(a) of the GDPR, SNATT specifies that the information may be disclosed, where appropriate and necessary, to one or more recipients pursuant to Article 4(9) of the GDPR, generally identified by category as follows: (i) for the purposes of processing referred to in Article 2.1. (a): persons authorised by SNATT to process data pursuant to Articles 4(10), 29 and 32(4) of the GDPR; companies/professionals providing services related to the fulfilment of this processing purpose (e.g. ICT companies; legal firms; supervisory bodies); subsidiaries/affiliates of SNATT; where necessary, judicial authorities.

5. Transfer.

5.1. The information is/may be stored in automated, partially automated and/or non-automated files belonging to or otherwise attributable, even indirectly, to SNATT, and located within the European Economic Area (EEA). In the event that data is stored in fully or partially automated files potentially outside the EEA, SNATT hereby states that, pursuant to Article 13(1)(f) of the GDPR, it will comply with the safeguards set out in Chapter V of the GDPR.

6. Rights of the data subject.

6.1. With regard to the information, SNATT informs the data subject of their right to exercise the following rights, which may be subject to the restrictions set out in Articles 2-undecies and 2-duodecies of the Privacy Code: right of access under Article 15 of the GDPR: the right to obtain confirmation as to whether or not personal data is being processed, as well as the information referred to in Article 15 of the GDPR (e.g. purposes of processing, retention period); right to rectification pursuant to Article 16 of the GDPR: the right to correct, update or supplement personal data; right to erasure pursuant to Article 17 of the GDPR: the right to obtain the erasure, destruction or anonymisation of personal data, provided that the conditions set out in that Article are met; right to restriction of processing under Article 18 of the GDPR: a right with a distinctly precautionary nature, aimed at obtaining the restriction of processing where the conditions set out in Article 18 apply; right to data portability under Article 20 of the GDPR: the right to obtain personal data provided to SNATT in a structured, commonly used and machine-readable format (and, where requested, to have it transmitted directly to another data controller), provided that the specific conditions set out in the same article are met (e.g. legal basis of consent and/or performance of a contract; personal data provided by the data subject); right to object pursuant to Article 21 of the GDPR: the right to obtain the permanent cessation of a specific processing operation involving personal data; right to lodge a complaint with the Supervisory Authority (i.e. the Italian Data Protection Authority) pursuant to Article 77 of the GDPR: the right to lodge a complaint where it is considered that the processing under review infringes national and EU legislation on the protection of personal data.

6.2. In addition to the rights described in Article 6.1 above, SNATT specifies that, where possible and relevant, the right exists to exercise, on the one hand, the (sub)right provided for in Article 19 of the GDPR ("The data controller shall inform each of the recipients to whom the personal data have been disclosed of any rectification, erasure or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18, unless this proves impossible or involves a disproportionate effort. The controller shall inform the data subject of such recipients if the data subject so requests"), to be considered connected and linked to the exercise of one or more rights regulated by Articles 16, 17 and 18 of the GDPR; on the other hand, SNATT specifies that, where possible and relevant, the right provided for in Article 22(1) of the GDPR ("The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her"), subject to the exceptions provided for in paragraph 2 below.

6.3. In accordance with Article 12(1) of the GDPR, SNATT undertakes to provide the information referred to in Articles 15 to 22 and 34 of the GDPR in a concise, transparent, intelligible and easily accessible form, using clear and plain language: such information shall be provided in writing or by other means, including electronic means, or, at the request of the data subject, shall be provided orally provided that the identity of the data subject is verified by other means.

6.4. In accordance with Article 12(3) of the GDPR, SNATT hereby informs you that it undertakes to provide information regarding the action taken in response to a request pursuant to Articles 15 to 22 of the GDPR without undue delay and, in any event, no later than one month from receipt of the request; this period may be extended by two months if necessary, taking into account the complexity and number of requests (in such cases, SNATT undertakes to inform the data subject of this extension and the reasons for the delay within one month of receiving the request).

6.5. The rights described above (with the exception of the right under Article 77 of the GDPR) may be exercised, subject, however, to the limitations set out in Articles 6.1 and 6.2 above, using the contact details provided in Article 7 below.

7. Contact details.

7.1. SNATT can be contacted at the following address: snattlogisticaspa@legalmail.it

7.2. The Data Protection Officer (DPO) pursuant to Article 37 of the GDPR, appointed by SNATT, is Gabriele Borghi, who may be contacted at the following address: dpo@snatt.it

Campegine (RE), 23 March 2026 (date of last update).

SNATT LOGISTICA S.p.A.

(represented by its current legal representative)