



# Boat Rent World.com

The best part of your holidays

## PRIVACY POLICY STATEMENT

**GDPR 679/16, Italian Legislative Decree 196/03 and Italian Legislative Decree 101/18**

**To the customers of Boat Rent World and its website, trademark owned by T F J in Somma Lombardo (VA), Italy.**

This policy is provided pursuant to Italian Legislative Decree 196/2003 and articles 13 and 14 of (EU) Regulation 2016/679 of the European Parliament and Council, dated 27<sup>th</sup> April 2016, concerning the protection of natural persons in relation to the processing of their personal data (for brevity GDPR 2016/679).

### 1. Data controller and processors - art. 13 parag. 1 letters [a] [b] GDPR 2016/679

The Data Controller is:

T F J, Somma Lombardo, VA, email: boatrentworld@yahoo.com, which the data subject may contact to exercise the rights recognised by the GDPR and to obtain an updated list of all Data Processors and their contact data.

### 2. Types of data processed

The Data Controller may process the data mentioned below, according to the category of data subjects:

- Website visitors:** visitors to the website may enter their contact data (name, surname, email address and telephone number) in order to be contacted back for information about our boat rentals. Should data subjects wish to complete the boat booking they won't be required to provide further details on the booking stage.
- Direct customers:** customers who go to the Boat Rent World boarding points will be asked to provide: personal details, contact data, invoicing data in order to sign the rental contract required by law.
- Geolocation of the boats:** all boats are equipped with real-time location tracking systems by GPS for insurance purposes only and to safeguard the company's assets.
- CCTV:** some of our boats and some of our boarding points are equipped with CCTV and its use is reserved only to protect company assets and the safety of our customers.
- Photographs:** the customer may be asked to have his or her photograph taken at the start, during or at the end of their rental for promotional purposes. These photographs may be used by the Controller for publication on the website and for creating brochures and other advertising material. Previous verbal request will be done to the customer and his/her acceptance will give us the right to do so. On some locations this will also be mentioned on the rental contract.

### 3. Purpose and legal basis for the processing - art. 13 and 14 paragraph 1 letter [c] GDPR 2016/679

The purposes and legal bases for the processing of the categories of data subjects listed in the previous paragraph from a) to d) are as follows.

- To **execute a contract** to which the data subject is a party or to execute precontractual measures adopted at the request of the same;
- To **execute a contract** to which the data subject is a party or to execute precontractual measures adopted at the request of the same;
- To pursue the **legitimate interest of the Controller** regarding the safeguarding of company assets and the protection of the safety of customers, in particular the Data Controller hereby lists the purposes for using a geolocation system: i. Insurance purposes to safeguard the company's assets, recovery of boats in the event of theft; ii. Insurance purposes to safeguard the company's assets and customers' safety, recovery of boats in the event of accident or loss; iii. Recovery and support to the customer in the docking stage.
- To acquire the **consent** of the data subject.

There is no further processing based on the legitimate interest of the Data Controller.

### 4. Origin of data on the website "Contact Us" - art 14 parag. 2 lett. [f] GDPR 2016/679

The data indicated at point 2 letter a), will be collected at the time of registering on the website in the area called "Contact us". Such data are therefore supplied directly by the data subject and do not come from sources accessible to the public.

### 5. Communication and dissemination of data - articles 13 and 14 parag. 1 lett. [e] [f] GDPR 2016/679

All the aforementioned information may be transmitted, without the need for further consent, to external companies and consultants required for performance of the contractual relationship, according to the provisions of applicable legislation, such as, for example, insurance companies, legal firms, boat rental partners, accountants, notaries public, technical advisers, etc.

A complete list of recipients, as stated above, can be obtained by sending a specific request using the contact information given at point 1.

### 6. Monitoring, storing of data and length of their retention - articles 13 and 14 parag. 2 lett. [a] GDPR 2016/679

The processing of personal data involves the collection, recording, organisation, retention and possible communication of said personal data to third-party subjects as described at point 5, in compliance with the rules of lawfulness, legitimacy, confidentiality and security envisaged by applicable legislation.

The files concerning the data subjects pursuant to letters a)-d) of point 2 are stored on the company server, which can only be accessed by System Administrators and to those authorised to perform processing, as well as internal and external processors (Ref. Complete List available to contacts pursuant to point 1), who are therefore required to have access to the information for legitimate purposes only, linked to the nature of their work.

Paper documentation is stored safely in cabinets positioned in the office division, and is therefore accessible only to the staff of Boat Rent World.

The databases of Boat Rent World feature systems that guarantee protection against unauthorised access, and against other external factors that may cause damage to the personal data. The requirements for access to data are regulated and access is permitted only to those pursuing the purposes and required for processing.

With regard to location tracking using GPS, letter c) of point 2, this is permitted only to the Data Controller and in-house Head of GPS management for the sole purposes stated in point 3, using the special "SafeFleet" application installed on smartphones. Access to the smartphone is protected by a password, as is access to the application in question.

Reiterating the guarantee that access to personal information is limited to employees and workers of Boat Rent World, or to other people working for the same, based on the need for processing, we declare that appropriate training will be given to all employees and workers who are able to access said personal information.

The length of time the personal information is retained will depend on the duration of the relationship and the legislation on the countries where your rental takes place.

The retention period may, however, be longer than the contractual period, due to legislative obligations or the need to manage complaints or non-conformities arising after the relationship has ended.

### 7. Transfer abroad of personal data

The personal information may be transferred, stored or processed in places outside Italy or European Economic area (EEC). Should the countries where the personal information is transferred not offer a level of protection of the personal information equivalent to that of Italian Law, we shall ensure that the appropriate protection measures are put in place.

### 8. Rights of the data subject - art. 13 parag. 2 lett. [b] [c] [d] GDPR 2016/679 and art. 14 parag. 2 lett. [c] [d] [e] GDPR 2016/679

The data subject has the right to withdraw consent, obtain access to his or her personal data and their updating or rectification (the latter two can only be exercised if they refer to data concerning geolocation or photographs). The data subject, for legitimate reasons, has the right to obtain erasure of the same or the restriction of the processing that concerns it, the portability of the data and to object to their processing. Lastly, the data subject has the right to request anonymisation of the data. To exercise his or her rights, the data subject should contact the Data Controller using the contact information given in point 1.

### 9. Nature of the conferral of personal data and the consequences of a refusal to respond

The conferral of personal data is optional but any refusal shall make it impossible to complete the boat rental request.

### 10. Other instructions - art. 13 parag. 2 lett. [f] GDPR 2016/679 and art. 14 parag. 2 lett. [g] GDPR 2016/679

Lastly, with regard to the data subject's personal data, there is no automated decisional process, or processing that involves profiling.

The Data Controller does not intend to disseminate the data subject's personal data or even to transmit them to third parties for purposes other than those expressly stated in this privacy policy.

The Data Controller



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