



Privacy and Cookie Policy

Regulation (EU) 2016/679 on the protection of customers and drivers and with regard to the processing of personal data

As per art. 13 and 14 of the EU regulation (EU) 2016/679

Dear Customer and supplier,

in compliance with the provisions of art. 13 and 14 of the European Regulation (EU) 2016/679 (General Regulation on the Protection of Individuals with regard to the processing of personal data, hereinafter "Regulations" or "GDPR"), we inform you that your personal data provided by you or however recorded at the time of registration, as part of our activity, will be treated in compliance with the Rules and principles of fairness, based on the conditions of lawfulness as per art. 6 of the Regulations, transparency and protection of confidentiality provided for by it.

This circular, applied to all the interested people (hereinafter "interested parties") that live in the EU Countries, as well as the drivers of the affiliated companies which offer the individual transport service, relates to the visitors' personal data, when sending an email spontaneously to our email address, or when filling out the request form for car rental with driver (hereinafter "NCC") and /or contact form on our website, provided in order to allow visitors to contact the website manager by transmitting detailed information and data that our system could automatically record while visiting the website:

- when filling out a contact form, the IT system may register the means and the website through which it has accessed our website while the data that you will voluntarily give us through the contact forms will be transformed into an email that can be stored in our e-mail system. Your data may also be recorded in a database on the server relating to the website;
- while visiting the website, however, even if you do not fill out a contact form, we may automatically collect some user information, such as the means and the website through which you accessed our website, your IP address, the date and time of access to our service, the hardware, software or browser being used and information on the operating system of your computer, your clicks, the pages you visited on our site and the operations done.

The circular relates both of the drivers of the affiliated companies and the customers' provided personal data, who log into the web portal to book the car rental with driver service (hereinafter "MoveU") using the link (<http://www.moveu.it>) or throughout the APP, and the indirectly provided personal data of the other companies members of *SOA Corporate S.r.l.* group which is the parent (hereinafter "Group") of which *LORAN ITALIA S.r.l.* forms part of.

1. Holder of the processing of the personal data



The Data Controller (hereinafter "Data Controller"), as per Article 4 of the Regulation, is *LORAN ITALIA S.r.l.*, with registered headquarter in: Viale Giuseppe De Gennaro, 1 - 70123 (Ba) – Italia (hereinafter "LORAN") in the person of its legal representative who, under its prerogatives, may avail itself of the collaboration of data processors and / or authorized persons, expressly appointed.

2. Processed data

All the data during the booking (name, surname, Date of birth, email address, phone number, credit card, location of the starting car rental, tax information about the billing) collected in different ways, such as phone calls, contact with the customers service, social network, *MoveU* web portal, including third party suppliers services and business partners, and the data concerning the car rental and its related services (e.g. pickup and handoff location and time of the vehicle, type, license plate and conditions/status of the vehicle, requested services) will be processed by LORAN. The aforementioned web portal *MoveU* uses cookies and other electronic tools to collect analytics information concerning the use of our website, with the prior agreement.

3. Purposes of processing personal data

The data provided to the Data Controller, not included in the particular categories of personal data as listed in art. 9 of the Regulations, will be processed by LORAN. for the following purposes:

3.a. Administrative and accounting objectives

All your data are processed for purposes connected with the LORAN economic activity only and more specifically with administrative and accounting purposes: pre-contractual requirements (offers, order processing, etc.), fulfillment of legal, community and contractual obligations; risk control (in particular fraud, insolvency, reliability, etc.), litigation management, electronic payment instruments management, to process requests sent by the user to provide the product and/or service requested. For these purposes, the provided data during the reservation can be (name and surname, address, contacts, payment method, location of the starting car rental, tax information for billing) and all the data concerning the car rental with driver (NCC) and to its related services. The above data are needed in order to make available the transfer services. The electronic payment processing and the automatic processing of personal data information, in order to provide the pricing operations, are included, which determine the cost of the ride based on constantly changing components, as time and distance estimated on the route, the traffic estimation and the number of users and drivers who use the web platform in a certain moment.

With reference to these processing purposes, any refusal by the interested party to provide the requested data will determine the impossibility of establishing contractual relationships.

3.b. Satisfaction measurement

Detecting the user's experience of the platforms, products and services that we offer and ensure the proper functioning of web pages and their contents.

3.c. Operational and strategic marketing

Updating occurs through the sending of promotional material, even personalized, through periodic newsletters (technical communications, commercial and promotional communications related to the activities carried out by



LORAN, events, training updates, etc.), through market surveys, retargeting, telemarketing, web marketing, etc. carried out by the Data Controller in his own interests and the companies associated with LORAN and / or in the interest of third-party companies but also directly through companies appointed by the Controller as data processors, on services, offers and initiatives of LORAN. or make them participate in market surveys (to better understand their preferences and to improve our offer).

3.d. Profiling

To perform profiling, that is analysis and processing of information about the user, his preferences, habits, consumption choices and / or browsing experiences. This activity is also carried out through the use of technologies such as cookies (for more information, see the "Cookie Policy"). Please note that all our data analysis activities and your preferences will not take place with exclusively automated methods, but will always involve the intervention and evaluation of our representatives.

3.e. Sharing of Partners' commercial promotions

Communicating your data to our business partners and to the SOA Corporate s.r.l. group who will contact you to let you know about their offers, promotions, updates on products and services.

3.f. Purposes of generic contract

Providing a better browsing experience in line with the preferences already shown in the online navigation or in the possibility of contacting you via the contact details you sent us in order to process any requests contained in the message sent to us through the contact form, arrange for you an appointment in the nearest facility or inform you of any event reminders, messages and promotional initiatives and market researches promoted by the structures adhering to our project.

4. Methods and legal bases of treatment

The data may be provided by you at the time of registration at our offices, using paper and / or electronic forms, provided at events, fairs and events to which LORAN. participates or organized by LORAN, by members of the sales and assistance network of LORAN or by the commercial partners of LORAN. or provided in the course of your interaction with the websites, the internet and mobile applications of LORAN.

The legal basis of the data processing referred to:

- a) It will be the fulfillment of the contractual relationship established with you (Article 6, paragraph 1, letter b) and c) of the Regulation), given that the treatments put in place for these purposes are necessary for the fulfillment of contractual obligations and do not require of a specific consent by the interested party;
- b) The treatments put in place for these objectives respond to a legitimate interest of the Data Controller;
- c) The treatments put in place for these objectives are performed with the user's specific consent, with the exception of commercial communications concerning similar services to those already purchased and subscribed by the user, to whom the processing responds to a legitimate interest of the Data Controller;
- d) The treatments put in place for these objectives are performed with the user's specific consent, with the exception of an analysis of elementary information related to your consumption preferences;
- e) I trattamenti posti in essere per queste finalità vengono effettuati con lo specifico consenso fornito dall'utente;
- f) It will be the fulfilment of the contractual relationship established with you (Article 6, paragraph 1, letter b) and c) of the Regulation), given that the treatments put in place for these purposes are necessary for the fulfilment of contractual obligations and do not require of a specific consent by the interested party.



Your consent will always be freely revocable, by writing to privacy@soacorporate.com and will be taken over by the privacy office in staff to the Data Protection Officer.

Please note that, in case of revocation of consent, you will no longer be recipients of any type of communication, with no mode. If you wish, you may revoke your consent only for the receipt of communications by electronic means (eg e-mail, text messages, instant messaging), continuing to receive technical and / or commercial communications only by mail or telephone contact with an operator, if provided.

This site collects and processes data according to your consent. With the use or consultation of this website, visitors and users explicitly approve this information and consent to the processing of their data in relation to the methods and purposes f) of the previous paragraph 2 "Purpose of the processing of personal data" of this information, described below, including any disclosure to third parties if necessary for the delivery of a service.

Failure to provide and / or to consent, where necessary for the processing of your data, for the purposes described in paragraph 2, will make it impossible to re-contact you and process your request, send communications regarding our promotional activities or provide some services and the experience browsing the website, could be compromised. Starting from 25 May 2018 (date of entry into force of the GDPR), this website will process some of the data based on the legitimate interests of the data controller.

5. Nature of the provision of data and methods of processing

The provision of data by the interested party is mandatory for all the aforementioned purposes 2.a), while for purposes 2.b), 2.c), the consent is optional and explicit.

Data processing (e.g. name, surname, contacts, address etc.) which is necessary to manage the reservation and its related car rental with driver and for the fulfilment of the resulting obligations (in the fields of taxation, accounting and insurance) will occur with the support of IT department, telematic and / or paper support, according to the logic related to the specifications indicated above and, in any case, adopting procedures and measures suitable to protect their security and confidentiality and by LORAN or companies expressly appointed as data controllers.

LORAN might process the user's common personal data, without any expressed consent, for the following service purposes:

- To manage and maintain the website;
- To allow the user to benefit from the existing functions;
- To manage the user's requests and notifications;
- To send newsletters and technical information related to road safety;
- To collect spontaneous applications;
- To process a contact request;
- To fulfill the obligations established by laws, regulations, Community legislation or by an order of the Authority;
- To prevent or discover fraudulent activities or malicious activities that may damage the site;
- To exercise the Data Controller's rights, such as the exercise of a right in legal action, as well as for the domains and purposes of the activities rendered to customers.

In the above cases, the legal base of the personal data processing consists in giving the execution to a contract or in providing the products specifically requested or in following-up on a legal obligation or in protecting our legit interest.

Browsing data:



The computer systems and software procedures set up for this website acquire, during their normal operation, some personal data whose transmission is implied in the use of Internet communication protocols. Information are not stored or recorded in order to straightforwardly identify browsers, but according its nature, after being processed, can lead to identify internet users. This category of data includes the IP addresses, the addresses of the request, the time of the request, the method required, the numerical code indicating the status of the response given by the server and other parameters, related to the operating system and the IT environment user. These data are useful for obtaining anonymous statistical information on the use of the site and for checking its correctness.

Data provided voluntarily by the user:

The discretionary, explicit and voluntary sending of e-mails to the addresses indicated on this website or the completion and submission of contact forms entails the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the missive. The processing is carried out directly by the data controller, also through his internal agents.

6. Cookies

Cookies are short fragments of text that allow the web server to store information to be reused during the same visit to the website (session cookies) or later, even after days (persistent cookies). Cookies are stored, according to user preferences, by the single browser on the specific device used (computer, tablet, smartphone). Similar technologies such as, for example, transparent GIFs and all forms of local storage introduced with HTML5, can be used to gather information on user behavior and use of services. While browsing, these types of cookies will be installed on the site: session, analytics and profiling of third parties and in the following of this document we will refer to cookies and all similar technologies, simply by using the term "cookies" from now onward.

Based on the characteristics and use of cookies we can distinguish various categories:

- **Technical cookies:** sono quelli utilizzati solo per “effettuare la trasmissione di una comunicazione su una rete di comunicazione elettronica, o nella misura strettamente necessaria al fornitore di un servizio della società dell’informazione esplicitamente richiesto dall’abbonato o dall’utente a erogare tale servizio”. Non vengono utilizzati per scopi ulteriori e sono normalmente installati direttamente dal titolare o gestore del sito web. Possono essere suddivisi in cookie di navigazione o di sessione, che garantiscono la normale navigazione e fruizione del sito web; cookie di funzionalità, che permettono all’utente la navigazione in funzione di una serie di criteri selezionati al fine di migliorare il servizio reso allo stesso. Per la loro installazione non è richiesto il preventivo consenso degli utenti, mentre resta fermo l’obbligo di dare l’informativa ai sensi dell’art. 13 del Regolamento, che il gestore del sito, qualora utilizzi soltanto tali dispositivi, potrà fornire con le modalità che ritiene più idonee.
- **Profiling cookies:** are designed to create profiles related to the user and in order to send advertising messages in line with the preferences expressed surfing the net by the same user. Because of the significant invasiveness this device can have in the private sphere of users, European and Italian legislation requires the user to be adequately informed about their use and is to express explicit consent. The Article 122 of Legislative Decree no. 196/03 states that "the storage of information in the equipment of a contractor or a user or the access to information already stored, is permitted only on condition that the contractor or user, has given his consent, after having been informed with the simplified procedures referred to in the Article 13, paragraph 3 "(Article 122, paragraph 1, of Legislative Decree 196/03). This site uses profiling cookies.



- **Third-party cookies:** visiting the website you can receive cookies from sites managed by other organizations (third parties), such as the scripts or social plugins of Facebook, Twitter, Google, LinkedIn. These are parts of the page visited, generated directly by the aforementioned sites and integrated into the page of the host site. The most common use of social plugins is aimed at sharing content on social networks. The presence of these, involves the transmission of cookies to and from all sites, operated by third parties. The management of information collected by "third parties" is governed by the relevant information to which reference is made. To ensure greater transparency and convenience, the following are the web addresses of the various information and how to manage cookies.

- ✓ Facebook: <https://www.facebook.com/help/cookies/> ;
- ✓ Twitter: <https://support.twitter.com/articles/20170514> ;
- ✓ LinkedIn: <https://www.linkedin.com/legal/cookie-policy> ;
- ✓ Google: <http://www.google.it/intl/it/policies/technologies/cookies/> ;
<https://www.google.it/policies/privacy/partners/>

This site also includes some components of analytical cookies of third parties transmitted by:

- **Google Analytics:** is a web traffic analysis service provided by Google. It is a third-party cookie collection and managed anonymously to monitor and improve the performance of the host site (performance cookies). Google Analytics uses cookies to collect and analyse anonymous information on the behavior of use of the website, including the user's IP address. This information is collected and processed in order to draw up reports, regarding the activities on the websites themselves. Google does not associate the IP address with any other data held by Google, nor does it attempt to link an IP address, with the identity of a user. Google may also communicate this information to third parties, where required by law, or where such third parties process the information on Google's behalf. This site uses the Google analysis tool to monitor or collect personal identification information. The user can selectively disable the action of Google Analytics following the directions specified at the following link: <https://tools.google.com/dlpage/gaoptout>.

Session cookies remain active only until the browser is closed or the log-out command is issued. Persistent cookies remain active when the browser is closed to be available in subsequent visits by the user. In some cases, a deadline is set, determined by the server when they are created, while in others the duration is unlimited until the user has removed it.

6.1. How to manage and deactivate cookies

The user can decide whether to accept cookies using the settings of his browser. The usability of public content is also possible by completely disabling cookies, while the total or partial disabling of technical cookies can compromise the use of site features reserved for registered users. The disabling of "third-party" cookies does not in any way affect the navigability of the sites. The setting can be defined specifically for different websites and web applications. In addition, browsers typically allow you to customize settings for different types of cookies, define whether to accept them or not and proceed with their removal.

Hereinafter the links to the main browser:

- ✓ Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- ✓ Mozilla Firefox: <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>



- ✓ Internet Explorer: <http://windows.microsoft.com/it-it/windows7/how-to-manage-cookies-in-internet-explorer-9>
- ✓ Microsoft Edge: <http://windows.microsoft.com/it-it/windows-vista/block-or-allow-cookie>
- ✓ Opera: <http://help.opera.com/Windows/10.00/it/cookies.html>
- ✓ Safari: http://support.apple.com/kb/HT1677?viewlocale=it_IT

For further information about how to manage cookies in your browser: <http://aboutcookies.org>

For further information about cookies and to manage your preferences on third-party profiling cookies, please visit: <http://www.youronlinechoices.com>.

6.2. Other third-party cookies

Visiting a website, you may receive cookies from the visited site ("owners") and from sites managed by other organizations ("third parties"). An example is the presence of "social plugins" for Facebook, Twitter, Google+, LinkedIn, etc. These are parts of the page visited, generated directly by the aforementioned sites and integrated into the page of the host site. The most common use of social plugins is aimed at sharing content on social networks.

The presence of these plugins involves the transmission of cookies to and from all sites, managed by third parties. The respective circulars rule the management of this information collected by "third parties". To ensure greater transparency and convenience, here follows the web addresses of the various information and how to manage cookies.

- Facebook information
- Facebook (configuration): access your account > Privacy section
- Twitter information
- Twitter (configuration)
- Informative LinkedIn
- LinkedIn (configuration)
- Google+ information
- Google+ (configuration)
- Informative Instagram
- Informative Pinterest

Cookies are connected to the browser in use and CAN BE DISABLED DIRECTLY FROM THE BROWSER, refusing/withdrawing consent. Disabling cookies may influence the correct use of some features of the site. Instructions for disabling cookies can be found on the following web pages: Mozilla Firefox - Microsoft Internet Explorer - Microsoft Edge - Google Chrome - Opera - Apple Safari.

7. Duration of treatment and criteria for the storage of Personal Data

Your personal data will be processed only for as long as necessary to accomplish contractual, legal and settlement obligations, without prejudice to laws and regulations of the Authorities, while respecting rights and in compliance with the obligations or to defend or to claim a right.

- The Data will be stored according to the following criteria:
- The Data processed for the purposes referred to in subparagraph a) of paragraph 2 "Purpose of the Processing of Personal Data" of this policy, will be kept for a period of 10 years following the termination of the relationship, except in the case further conservation is required, in order to allow LORAN the protection of their rights;
- The Data processed for the purposes referred to in letter b), c) of paragraph 2 "Purpose of the Processing of Personal Data" of this policy, will be kept for a maximum of 24 months.



- The Data processed for the purposes referred to in letter d) of paragraph 2 “Purpose of the Processing of the Personal Data” will be kept for a maximum of 12 months
- The Data processed for the purposes referred to in letter e) paragraph 2 “Purpose of the Processing of Personal Data” will be treated until the possible revocation of the consent by the person concerned
- We will inform you that data concerning the navigation logs, in case they are recorded, will be stored by the Data Controller for three months

Personal data of the site concerning the objectives referred to in paragraph e) can be also stored by the Italian Law to safeguard the legitimate interests of the Data Controller of LORAN (art. 2947, par. 1 and 3 of the Italian Civil Code).

8. Redirect towards external websites

The website can use the c.d. social plug-in. Social plug-ins are special tools that incorporate the features of the social network within the website (for example, the "like" function of Facebook).

All social plug-ins on the site are trademarks of the respective logo owned by the social network platform (eg Facebook, Google, Twitter, LinkedIn).

When you visit a page of our site and interact with the plug-in (for example the "Like" button) or you decide to leave a comment, the necessary information is transmitted from the browser directly to the social network and then stored on the mentioned above platform. Regarding the information about purposes and the activities concerning collection, use, manage and storage of personal data on the social network platform, as well as how to exercise your rights, please review the privacy policy adopted by each social network platform.

9. Links to/from third-party websites

From this website it is possible to connect, through appropriate links, to other websites. The Data Controller declines any responsibility regarding any request and / or release of personal data to third party sites and regarding the management of authentication credentials provided by third parties.

10. Security measures

LORAN processes your data in order to maintain the safety, the protection and the integrity of our services and interested parties.

For instance, are included:

- The control of the drivers' reliability requisites, before giving them the authorisation to use our services, if the laws permit, helps to prevent the use of our services to the drivers who may be a risk a serious risk to safety;
- This site processes data in a lawful and correct manner, adopting appropriate security measures to prevent non-specific access, disclosure, modification or unauthorized destruction of data. The processing is carried out using IT and / or telematic tools, with organizational methods and with related logics related to the purposes indicated. In addition to the owner, data can be accessible to the appointees involved in the organization of the website (staff belonging to administrative, commercial, marketing and legal areas as well as system administrators) and external subjects (third party technical service providers, hosting providers, IT companies, communication agencies).



11. Scope of transfers and spread of personal data

In compliance with the purposes set out in point 2 and without prejudice to any communication to third parties performed for the implementation of legal obligations, the data may be transferred by us to countries belonging to the European Community, to the following subjects:

- associated companies of the SOA Corporate Group to which LORAN belongs;
- police, armed forces and other public administrations, for the fulfillment of obligations under the law, regulations or Community legislation. This area of communication also includes legal communications to the former authorities – pursuant to art. 126 of the Italian Road Traffic laws and the circular of the Minister of Interior n. 300/A/1/44248/109/16/1 of 12 August 2003, as amended following the decision of the Italian Constitutional Court 27/2005 where re-notification to the Customer (even by third parties) is necessary, sanctions applied as a result of the violation of Road Traffic Laws while you were using as the effective driver a vehicle assigned to LORAN;
- companies, agencies, consortiums and associations exercising credit protection activities; companies and subjects contractually bound to LORAN whose main activity concerns management of claims. In case of communication/transfer of data abroad and the related processing will be in full compliance with art. 44 of the Regulation, for the transfer within the EU countries, of the current General Authorizations concerning the transfer of personal data toward third countries not belonging to the European Union. It might happen that, when specific activities connected to the fulfilment of the rental contract (eg. Management of claims), LORAN might collect and process your personal data as intended in art.9 of the Regulation, such as data concerning (i) health conditions (e.g. when a support for disability is required that is manual control or when an accident occurs and we must collaborate with insurance companies or companies that manage compensation claims in relation to injuries suffered) or (ii) affiliation with a trade union (or similar organizations) when a CDP promotional code usable by just a member of such trade union or organization. In particular, LORAN might proceed with the processing of personal data which shall reveal your health conditions. In such cases from which your written consent is required, we inform you that LORAN shall process your data in full compliance with the Regulation and the current General Authorizations of the Guarantor applicable in the field of special data processing;
- service centers, mechanical workshops, car rental companies and commercial partners in general, such as, for example, vehicle suppliers and outsourced service companies;
- our staff, appropriately appointed and informed;
- banks and credit institutions;
- insurance companies responsible for the settlement of claims;
- companies specializing in management of fees invoicing services; detection of financial risks and prevention of frauds (particularly databases set up to assess credit risks, managed by private individuals and accessible to many subjects); credit recover; fines management; recover of the vehicle;
- factoring companies;
- advisors and professionals (website management, IT archives, etc.);
- auditors;
- legal, tax and IT consultants from companies and / or individuals who provide us with data processing and maintenance services;
- shippers, carriers and couriers;
- judicial offices, in the context of criminal investigations or other subjects whose right to access data is recognized by law;
- companies, entities and / or natural persons who perform related, instrumental and / or support activities to ours, or necessary and / or functional to the execution of the contracts or services requested;
- companies that install and manage, on behalf of LORAN, satellite anti-theft systems (GPS and similar) or position detectors. With regard to the communication referred to in paragraph 8 above, the installation of



satellite burglar alarms or position detectors makes it possible to identify the vehicle on the territory or in certain geographical areas, even without continuous tracking. The subjects belonging to the categories referred to in paragraphs 3, 5, 7, and 8 above, process the data as co-controllers of the Processing pursuant to art. 26 of the Regulations. For the purposes referred to in lett. 2.e), subject to your consent, the Customer's data may be communicated to companies, bodies, consortiums and associations operating in Italy, in the EU member states, for market research, economic analysis and statistics, marketing, promotion and sale, even at home, of goods, products and services.

This site may share some of the data collected with services located outside the EU. Especially with Google, Facebook and Microsoft (LinkedIn) through social plugins and the Google Analytics service. The transfer is authorized on the basis of specific decisions of the European Union and the Guarantor for the protection of personal data, particularly the decision 1250/2016 (Privacy Shield) for which no further consent is required. The companies mentioned above guarantee their adherence to the Privacy Shield.

12. Rights of the interested parties

We inform you that at any time, in the field of data processing, by sending a communication to the following email address privacy@soacorporate.com or through registered letter to the following address Viale Giuseppe De Gennaro, 1 - 70123 (BA), you may exercise your rights within the limits and under the conditions set out in articles 7, 15, 16, 18, 20 and 22 of the Regulation.

In particular, you have the right to withdraw at any time the consent to the treatment provided and to oppose the processing of his data, in particular for marketing purposes or analysis of his preferences as explained in the following paragraph.

Interested parties who believe that the processing of their personal data carried out through this service is in violation of the provisions of the Regulations have the possibility to send a communication to the Data Processor at the email address dpo@soacorporate.com or have the right to propose a complaint to the Supervisory Authority (Privacy Authority), as required by art. 77 of the Regulation itself, or to take appropriate judicial offices (art. 79 of the Rules).

- ❖ Personal Data Protection Authority information
Piazza di Monte Citorio, 121
00186 Rome
Phone +39 06 6967 71
Fax +39 06 6967 7785
E-mail garante@garanteprivacy.it
Website <http://www.garanteprivacy.it/>

13. Revocation of consent to the personal data processing

You have the right to revoke your consent to the processing of your personal data at any time by sending a registered letter to the following address: LORAN Italia S.r.l. with registered headquarters in Viale Giuseppe De Gennaro 1, 70123 Bari (BA), with the following text: **“Revocation of consent to the personal data processing”** accompanied by a photocopy of your ID card. The request can be sent also at this email address privacy@soacorporate.com.

At the end of this operation, your personal data will be removed from the archives as soon as possible.



For further information on the processing of your personal data, please use the email address privacy@soacorporate.com. Before being able to provide or modify any user information, it may be necessary to verify the user identity and answer some questions to guarantee the regularity of the contact.

14. Contact data of the Data Protection Officer

Data Protection Officer appointed by LORAN can be contacted at the email address dpo@soacorporate.com.

15. Exercise of rights

The user can contact LORAN as Data Controller or the Data Protection Officer at the above addresses to get an updated list of our data processors (that is, our service providers), the subjects to whom the data are communicated and to exercise the rights provided for by art. from 15 and 22 of the Data Protection Regulation.

Specifically, the User may always request access to his personal data stored in our Database through an explicit request, by sending an Email with the nature of the request to the e-mail address privacy@soacorporate.com. The user can also exercise the right to be forgotten /cancel his personal data, at any time.

The interested party must address his written request to the attention, in one of the following ways:

- By email to the appropriate address: privacy@soacorporate.com
- By fax to the following telephone number: +39 080 4322 904
- By registered letter to the following address: LORAN Italia S.r.l. in Viale Giuseppe De Gennaro, 1 – 70123 (BA) Italy

16. Update

This circular will be regularly updated. Therefore, LORAN invites the interested parties, who wish to know the personal data processing methods, to visit this page periodically.

A possible entry into force of new regulations, as well as the constant examination and updating of services to the user, could entail the need to modify the methods and terms described in this circular. It is therefore possible that this document will change over time. We therefore invite you to consult this page periodically. We will publish any changes to this Information on this page and when changes are significant, we will notify you with a more visible notification. In any case, previous versions of this information will be stored to allow consultation.

This circular has been updated on 24/04/2019.