# PERSONAL DATA PROCESSING PRIVACY NOTICE

*issued pursuant to Articles 13 and 14 of EU Regulation 2016/679*

**“Booking DR Logistics” Platform for booking delivery, loading and goods collection time slots**

We hereby inform you that DR Logistics S.r.l., as Data Controller, processes the personal data of individuals who use the “Booking DR Logistics” platform (hereinafter the “Platform”) to book, manage and view time slots for the delivery, loading and collection of goods at its operating sites and enabled logistics hubs, in accordance with EU Regulation 2016/679, the General Data Protection Regulation (hereinafter the “GDPR”), and Legislative Decree No. 196/03, the Personal Data Protection Code, as amended by Legislative Decree No. 101/18 (hereinafter the “Privacy Code”).

This privacy notice is addressed to the natural persons whose data are processed through the Platform, and in particular: registered users and persons who enter a booking without registering (contacts and logistics or administrative staff of suppliers and carriers); drivers and personnel assigned to transport vehicles, including where their data are entered by someone other than the data subject; and DR Logistics S.r.l. internal users authorised to access the back office. This notice is provided pursuant to Article 13 of the GDPR for data collected from the data subject and Article 14 of the GDPR for data obtained from third parties. Processing is carried out in accordance with the principles of lawfulness, fairness, transparency, purpose limitation and data minimisation set out in Article 5 of the GDPR.

## DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data Controller is DR Logistics S.r.l., with registered office at Via Lombardia s.n. – 29100 Piacenza (PC), Italy – VAT No. 01477300337. The Data Controller’s contact details are: Tel. (+39) 0523 609538; E-mail: info@drlogistics.it; Certified e-mail (PEC): drlogisticssrl@mypecmail.it. For matters concerning the processing of personal data and the exercise of data subject rights, you may also contact the Data Protection Officer (DPO) at: dpo@dimartinogroup.eu.

## PURPOSES OF PROCESSING AND LEGAL BASIS

Personal data are processed exclusively for the purposes set out below, all of which are connected with the booking and management of goods deliveries, loading operations and collections.

a) Booking and management of time slots. Processing is intended to enable the booking of time slots at enabled operating sites, verification of order numbers against orders uploaded to the system, allocation of loading bays and time windows, monitoring of daily capacity limits, management of booking statuses and related deliveries, sending of confirmations and notifications by e-mail, and management of documents attached to bookings, including transport documents. The legal basis is Article 6(1)(b) of the GDPR where the data subject is a party to the contractual relationship or to pre-contractual measures with the Data Controller (for example, a supplier or carrier operating as a sole trader).

b) Account management and authentication. Data are processed for user registration, e-mail address verification, access, credential resets, and the assignment of roles and permissions. The legal basis is Article 6(1)(b) of the GDPR where the data subject is a party to the contractual relationship.

c) Site organisation and security. Booking data (driver, vehicle registration number, time slot and bay) may be accessed by the relevant personnel to verify, upon arrival at the site, that the booking, driver and vehicle correspond, to organise access flows and to protect the safety of persons, goods and premises. The legal basis is the Data Controller’s legitimate interest pursuant to Article 6(1)(f) of the GDPR. Any video-surveillance systems installed at the sites are covered by a separate privacy notice.

d) Platform security and prevention of abuse. Log data are processed to record the creation, amendment and deletion of bookings and deliveries; prevent unauthorised access, improper use and automated submissions (including through the reCAPTCHA service); ensure data security pursuant to Article 32 of the GDPR; and demonstrate the proper conduct of operations. The legal basis is the Data Controller’s legitimate interest pursuant to Article 6(1)(f) of the GDPR.

e) Compliance with legal obligations. Data may be processed to comply with obligations laid down by laws, regulations and European Union legislation, including tax, accounting and administrative obligations connected with transport documents, as well as requests from competent authorities. The legal basis is Article 6(1)(c) of the GDPR.

f) Protection of rights. Data may be processed to establish, exercise or defend a right of the Data Controller in judicial or out-of-court proceedings. The legal basis is the Data Controller's legitimate interest pursuant to Article 6(1)(f) of the GDPR.

Data are not used for marketing, promotional or advertising communications, customer satisfaction surveys or personnel recruitment, nor are they disclosed to third parties for such purposes. E-mails sent by the Platform are exclusively service-related (booking confirmations and changes, operational notifications, and credential verification and reset messages).

Pursuant to Article 22(1) of EU Regulation 2016/679, in none of the cases described above will your personal data be subject to decision-making processes based solely on automated processing, including profiling as defined in Article 4(4) of that Regulation. The automated checks of order-number matching and time-slot capacity are technical consistency checks on the data entered and do not produce legal effects or similarly significantly affect the data subject.

## NATURE AND SOURCE OF THE DATA PROCESSED

For the purposes described above, the Data Controller processes the following categories of data, to the extent necessary:

- Identification and contact data: first name, surname, e-mail address, telephone number, name of the supplier or transport company to which the individual belongs, and position held.
- Authentication and profile data: login credentials, assigned role and permissions, and e-mail address verification status.
- Vehicle data: registration number of the vehicle and any trailer.
- Booking and delivery data: site, bay, date, time and duration of the time slot, booking status, order number, supplier number, product category, number of items, packages and pallets, details of the transport document (DDT), and documents attached to the booking in PDF, Excel or CSV format.
- Technical and log data: records of activities carried out on the Platform (creation, amendment and deletion of bookings and deliveries), user, date and time of the operation, IP address and other technical data necessary for the operation and security of the service.

Data are provided directly by the data subject during registration or booking or, with regard to drivers and assigned personnel, by the supplier or carrier (or a person appointed by them) making the booking; information relating to orders is uploaded to the system by the Data Controller. Data are not obtained from publicly accessible sources. No banking or payment data, special categories of personal data under Article 9 of the GDPR, data relating to criminal convictions and offences under Article 10 of the GDPR, or CVs are requested or processed. Users are asked not to enter in free-text fields or attachments any personal data beyond those strictly necessary.

Any user who enters data relating to drivers or other individuals into the Platform warrants that they are authorised to do so and undertakes to make this privacy notice available to those individuals. The Data Controller also makes this notice available for that purpose pursuant to Article 14 of the GDPR.

## CATEGORIES OF DATA RECIPIENTS

Without prejudice to disclosures made in fulfilment of legal obligations, the data collected and processed may be disclosed, exclusively for the purposes specified above, to the following categories of recipients:

- Employees and collaborators of the Data Controller responsible for logistics, warehousing, reception and administration, who are expressly authorised and trained pursuant to Article 2-quaterdecies of Legislative Decree No. 196/03 and Article 29 of the GDPR, and who will receive specific instructions from the Data Controller regarding the processing of your data;

- Third parties appointed as data processors pursuant to Article 28 of the GDPR, with whom the Data Controller has entered into specific agreements governing the processing of your data and providing written instructions on how the data are to be processed;
- Entities acting as independent data controllers or other third-party recipients, to the extent necessary: customers on whose behalf the delivery, loading or collection is carried out, limited to booking information and delivery status; competent authorities, where required by law; and consultants and professionals engaged to protect the Data Controller's rights, who are bound by professional secrecy.

The complete and up-to-date list of recipients, or of data processors appointed pursuant to Article 28 of the GDPR, may be consulted at the Data Controller's offices or obtained by submitting an express and reasoned request to the Data Controller.

Your personal data will under no circumstances be disseminated.

## METHODS AND PLACE OF DATA PROCESSING

Data are processed using IT and electronic tools through the Platform, which is provided as a cloud service, with technical and organisational measures appropriate to the risk pursuant to Article 32 of the GDPR. These include access controls differentiated by roles and permissions, logging of operations, the viewing of bookings entered by unauthenticated users, and the downloading of attached documents exclusively through a signed link. Data are hosted on infrastructure located in Europe.

## DATA RETENTION PERIOD

Data are retained for the period strictly necessary to achieve the purposes described above, in compliance with the storage limitation principle under Article 5(1)(e) of the GDPR, for the periods set out below and as further described in the Data Controller's Record of Processing Activities. Once these periods have expired, the data are deleted or anonymised.

| **Data** | **Retention period** |
|---|---|
| Identification, contact, vehicle registration, booking and delivery data | 12 months from the date of the booked time slot. |
| User account data (credentials, role and permissions) | For the duration of the authorisation; deletion or deactivation within 30 days of access being revoked or of the data subject's request, without prejudice to the provisions applicable to the other categories. |
| Activity logs and technical security data | 12 months from recording. |
| Documents attached to the booking | 12 months from the date of the booked time slot. Transport, tax and accounting documentation retained in the Data Controller's administrative systems to comply with legal obligations is kept for the periods required by applicable law (Article 2220 of the Italian Civil Code: ten years). |

## PROVISION OF DATA AND CONSEQUENCES OF REFUSAL

Providing the data marked as mandatory by the Platform is essential to achieve the purposes described above. Any refusal to provide all or part of such data will make it impossible to register, book a time slot and, consequently, carry out the delivery, loading or collection at the relevant site. Providing any additional data marked as optional does not affect the use of the Platform. No processing carried out through the Platform is based on the data subject's consent.

## DATA SUBJECT RIGHTS

As data subjects, you may exercise, subject to a preliminary assessment and verification of their applicability, the rights set out in Articles 15 to 22 of EU Regulation 2016/679. In particular, under those Articles, data subjects may exercise the following rights:

- Right of access (Article 15): the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you are being processed and, where that is the case, access to the personal data and the information specified by law.
- Right to rectification or completion (Article 16): the right to obtain from the Data Controller, without undue delay, the rectification and/or completion of inaccurate or incomplete personal data concerning you.
- Right to erasure (“right to be forgotten”, Article 17): the right to obtain from the Data Controller, without undue delay, the erasure of personal data concerning you in the cases provided for by law.
- Right to restriction of processing (Article 18): where applicable, the right to obtain restriction of processing from the Data Controller.
- Right to notification (Article 19): the right to receive notification where personal data have been rectified or erased or processing has been restricted.
- Right to data portability (Article 20): where applicable, the right to receive, in a structured, commonly used and machine-readable format, the personal data concerning you that you have provided to the Data Controller, and the right to transmit those data to another data controller without hindrance from the data controller to which they were originally provided. This right applies to processing based on Article 6(1)(b) of the GDPR and carried out by automated means.
- Right to object (Article 21): the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you that is based on the Data Controller’s legitimate interest under Article 6(1)(f). In such cases, the Data Controller shall no longer process the data unless it demonstrates compelling legitimate grounds that override the interests, rights and freedoms of the data subject, or unless the processing is necessary for the establishment, exercise or defence of a legal claim.
- Right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you (Article 22).

You may exercise the above rights at any time by contacting the Data Controller and its Data Protection Officer using the contact details provided in this notice. The Data Controller will respond without undue delay and, in any event, within one month of receiving the request. This period may be extended by a further two months in the event of complexity or a high number of requests, pursuant to Article 12(3) of the GDPR.

Finally, pursuant to Article 77 of the GDPR, and without prejudice to any other administrative or judicial remedy, including under Article 79 of the GDPR, if you consider that the processing of your personal data infringes the Regulation, you have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali), Piazza Venezia No. 11 – 00187 Rome, in accordance with the procedures described on its official website: www.gpdp.it.

This privacy notice may be updated as a result of changes in legislation or changes to the methods of processing. Version 1.0 – October 2026.

**The Data Controller**
**DR Logistics S.r.l.**