

Privacy statement to clients

JAS Forwarding GmbH, with registered office in Neu-Isenburg, VAT no. DE 111 608 513, as data controller (hereinafter, "**Data Controller**"), informs you pursuant the EU Regulation no. 679/2016 ("**GDPR**") and the applicable national Data Protection law that your personal data shall be processed according to the following modalities and for the following purposes:

1. Scope of Data Processing

The Data Controller processes the following personal data, identifying and not sensitive/particular (in particular, name, surname, business name, address, email, phone number, VAT no., etc.) communicated by you during the phase of request for services to the Data Controller (hereinafter "**Data**" or "**Personal Data**").

2. Purposes and Legal Basis of Data Processing

Your Personal Data shall be processed, without your prior consent, for the following purposes and legal basis:

- the execution of the contract and/or the fulfilment of pre-contractual obligations, in particular:
 - the management of a contact request from you;
 - the management of contractual and pre-contractual relationships;
 - the execution of the agreement;
 - the management of service billing;
 - sending service communications.

- the fulfilment by the Data Controller of legal obligations such as:
 - compliance with the obligations established by laws, regulations or national and community legislation or imposed by the competent Authorities;
 - the compilation and processing of tax returns and the related requirements;
 - the book-keeping and the related obligations.

JAS Forwarding GmbH

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- the pursuing of a lawful interest by the Data Controller, in particular:
 - the exercising of rights by the Data Controller in Court and conducting of litigation;
 - the prevention and identification of fraudulent activities.

3. Modalities of Data Processing

The processing of your Data is carried out, both via hardcopy (paper) and electronic modalities, by means of data collection, registration, organization, storage, consultation, elaboration, amendment, selection, mining, confrontation, usage, interconnection, blockage, communication, cancellation and destruction operations.

4. Storage of Data

The Data Controller shall process the Personal Data for the time necessary to fulfil the above purposes and anyway for a period not exceeding 10 years from the termination of the contractual relationship.

5. Data provision

The provision of Data for the above purposes is necessary and mandatory and any possible refusal to provide said Data entails the impossibility to di establish or continue the contractual relationship with the Data Controller.

6. Access to Data

Your Data may be made accessible for the purposes mentioned above to:

- employees and/or collaborators of the Data Controller, in light of their role of persons in charge of the processing and/or internal Data Processors;
- companies of the JAS Group and third parties (e.g., IT provider, etc.) carrying out outsourcing activities on behalf of the Data Controller and processing Data as external Data Processors.

7. Data Communication

Your Data may be communicated, even without your prior consent, upon their request, to control bodies, police or judiciary bodies, Budgetary Ministry, Tax Authority, ministerial bodies and competent Authorities, Local Institutions and Tax Commissions, that will process them in their quality of independent Data Controllers for institutional purposes and/or pursuant to the law during investigations and controls. Moreover, your Data may be communicated to third parties (for example, insurance funds, independent contractors, etc.) that will process them as independent Data Controllers to carry out activities that are instrumental to the above purposes.

8. Data Transfer

Your Data shall not be disseminated but they may be transferred in extra-EU countries for the purposes mentioned above. In order to ensure an adequate level of protection to the Personal Data, the transfer shall be carried out in force of the adequacy decisions of the European Commission or by adopting the Standard Contractual Clauses (SCC) of the European Commission.

9. Data Subjects' rights

The Data Controller informs you that you, as Data Subject, where the limitations provided by law are not applicable, has the right to:

- obtain confirmation over the existence or inexistence of Personal Data relating you, even if not yet registered, and their communication in a comprehensible way;
- obtain the indication and, if necessary, the copy of the: a) source and category of the Personal Data; b) logic applied in case the processing is performed by means of electronic instruments; c) purposes and modalities of the processing; d) identification references of the Data Controller and the Data Processors; e) subjects or categories of subjects to whom Personal Data may be communicated or who may come to know, in particular if recipients are extra-EU countries or international organizations; e) period for which the Personal Data will be stored, or if that is not possible, the criteria used to determine that period; f) existence of an automated decision-making process and, in this case, information about the logic involved, the significance and consequences for the data subject; g) existence of adequate safeguards in case of transfer of Personal Data to an extra-EU country or international organization;

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- obtain, without undue delay, the update, the rectification or, whether you are interested, the integration of incomplete Data;
- revoke the consents granted at any time, easily, without impediments, using, when possible, the same channels used to provide them;
- obtain the cancellation, the transformation into anonymous form or blocking of the Data: a) processed in breach of the law; b) no longer necessary in relation to the purposes for which the Data have been collected or subsequently processed; c) if you withdraw consent on which the processing is based and there is no other legal ground for the processing; d) if you object to the processing and there are no overriding legitimate grounds for the processing; e) in compliance with a legal obligation; f) referred to children. The Data Controller may refuse to erase them when the processing is necessary: a) to exercise the right of freedom of expression and information; b) in compliance with a legal obligation, for the performance of a task carried out in the public interest or in the exercise of official authority; c) for reasons of public interest; d) to achieve purposes in the public interest, scientific or historical research purposes or statistical purposes; e) for making legal claims;
- obtain the restriction of processing when: a) the accuracy of the Personal Data is contested; b) the processing is unlawful and the data subject opposes the erasure of the Personal Data; c) Data are required by you for your exercising of legal claims; d) pending verification whether the legitimate grounds of the controller override those of the data subject;
- receive the Personal Data concerning you in a structured, commonly used and machine-readable format and transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is carried out by automated means;
- oppose, in whole or in part: a) for lawful grounds to the processing of Personal Data regarding you, even if pertaining the purpose of Data collection; b) to the processing of Personal Data that relates to you for the purpose of sending advertising material or of direct sale or for market researches or commercial communication, by means of automated call systems without the intervention of an operator, e-mail and/or traditional marketing methods by telephone and/or paper mail;
- submit a data protection complaint to the competent supervisory authority.

In the cases mentioned above, if necessary, the Data Controller shall communicate any exercise of your rights to each third party to whom the Personal Data are communicated, except for specific cases (for example, if this proves impossible or involves disproportionate effort).

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10. Modalities of exercise of rights

You shall be able to exercise your rights anytime:

- by sending a registered mail with return receipt to the address of the Data Controller:
- by sending an email to Rolf.Hellwig@jas.com
- by phoning the number +49 6102 8229-702

11. Data Controller contact

The Data Controller is:

Mr. Rolf Hellwig
Director Sales Germany

JAS Forwarding GmbH
An der Gehspitze 120
D-63263 Neu-Isenburg

Telefon: +49 6102 8229-702
E-Mail: Rolf.Hellwig@jas.com

The updated list of the data processors and persons in charge of the processing is available at the registered office of the Data Controller.

Neu-Isenburg, May 25, 2018

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