

PRIVACY POLICY

Last updated: 06.10.2026

1. Introduction

This Privacy Policy explains how **[full legal company name]**, trading as **Extra Rail Service**, collects, uses, stores, shares and protects personal data through this website and in connection with enquiries, quotation requests and freight logistics services.

Personal data is processed in accordance with Regulation (EU) 2016/679, the General Data Protection Regulation, referred to in this Privacy Policy as the “GDPR”, and applicable Italian data-protection legislation. The GDPR regulates the protection of individuals in relation to personal-data processing and the free movement of personal data. [\[eur-lex.europa.eu\]](http://eur-lex.europa.eu)

This Privacy Policy applies to personal data collected:

- through this website;
- through contact and quotation-request forms;
- through email, telephone or other direct communications;
- during the preparation and management of transport and logistics services;
- through cookies, server logs and other technologies used to operate and protect the website;
- from customers, suppliers, logistics partners and other parties involved in a requested or contracted service.

2. Data Controller

The data controller responsible for the processing described in this Privacy Policy is:

[Full legal company name]

Trading as: **Extra Rail Service**

Registered office: **[full registered address]**

VAT number / Tax code: **[number]**

Company registration and REA number: **[details]**

General email: **[general contact email]**

Privacy enquiries and rights requests: **[privacy email address]**

Telephone: **[telephone number]**

For questions about the processing of personal data or to exercise rights under applicable data-protection law, individuals may contact Extra Rail Service using the details above.

3. Personal Data We Collect

Depending on how individuals interact with Extra Rail Service, we may process the following categories of personal data.

3.1 Contact and professional information

This may include:

- first and last name;
- company or organisation name;
- professional role or department;
- business or personal email address;
- telephone number;
- country or market of operation;
- preferred language and method of communication.

3.2 Shipment and quotation information

This may include:

- collection address or collection point;
- delivery address, destination or destination country;
- collection and delivery contact details;
- type and description of goods;
- number of pallets or packages;
- approximate weight, dimensions or shipment volume;
- preferred departure or delivery date;
- requested transport method;
- customs, documentation and shipping requirements;
- information about suppliers or collection locations;

- any additional details included in an enquiry.

The ERS contact-page copy asks prospective customers to provide the collection point, destination, type of goods, shipment volume and preferred departure date so that the company can evaluate the request. [\[Extra Rail...exts EN IT | Word\]](#)

Shipment information may constitute personal data when it identifies, relates to or can reasonably be associated with an individual, sole trader, company representative, supplier contact or delivery recipient.

3.3 Communications

We may process the content of enquiries and subsequent correspondence, including:

- contact-form submissions;
- email communications;
- telephone-call information;
- quotation discussions;
- operational instructions;
- service requests;
- complaints and feedback;
- information submitted in free-text fields.

3.4 Contractual and administrative information

Where a service is requested or provided, we may process:

- quotation and order information;
- contractual documentation;
- invoicing and payment information;
- transport and delivery documents;
- customs and import-export documentation;
- correspondence relating to the service;
- claims, incident reports and insurance documentation.

3.5 Technical and website-usage data

When individuals access the website, certain information may be collected automatically, including:

- IP address;
- browser type and version;
- device information;
- operating system;
- date and time of access;
- pages visited;
- referring website;
- interactions with the website;
- cookie identifiers;
- technical, security and diagnostic information.

3.6 Information supplied voluntarily

Individuals should not submit special-category personal data, confidential personal information or information unrelated to the requested shipment or service through free-text fields.

Special-category data includes information concerning health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic or biometric data, or a person's sex life or sexual orientation.

4. How We Collect Personal Data

We may collect personal data:

- directly from individuals who complete a contact or quotation form;
- when individuals contact us by email, telephone or another communication channel;
- when individuals request a freight quotation or logistics service;
- during commercial discussions or the performance of a service;
- from the company or organisation represented by the individual;
- from customers, suppliers, carriers, freight forwarders, customs representatives and delivery partners;

- from companies within the Extra Rail Service group where relevant to an enquiry or service;
- automatically through website infrastructure, security tools and cookies.

The current ERS Logistic website links users to a quotation form hosted through Microsoft Forms. [\[ERS Logistic\]](#)

Where personal data is not obtained directly from the individual, we will provide the information required by applicable data-protection law where necessary.

5. Purposes and Legal Bases of Processing

We process personal data only where an appropriate legal basis applies.

5.1 Responding to enquiries and preparing quotations

We use contact details and shipment information to:

- respond to an enquiry;
- understand the requested service;
- evaluate the cargo, route and destination;
- identify possible transport solutions;
- prepare a tailored quotation;
- contact the requester for additional information.

Legal basis: taking steps at the individual's request before entering into a contract and, where the requester represents a company, our legitimate interest in responding to business enquiries.

5.2 Providing freight and logistics services

Where a service is commissioned, we may process information to:

- organise collection and consolidation;
- select and coordinate carriers;
- plan road, railway, sea or multimodal transport;
- assist with customs and shipping documentation;
- coordinate terminal, warehouse and local-delivery operations;
- communicate operational updates;

- manage delivery and service completion.

Legal basis: performance of a contract or taking steps before entering into a contract.

Where the relevant individual represents a corporate customer, supplier or partner, processing may also be based on our legitimate interest in managing the professional relationship and delivering the requested service.

5.3 Managing customer, supplier and partner relationships

We may process professional contact information to:

- manage customer and supplier accounts;
- administer quotations and contracts;
- maintain operational communications;
- coordinate logistics partners;
- manage ongoing business relationships;
- respond to questions, requests and complaints.

Legal basis: performance of a contract or our legitimate interest in managing professional and commercial relationships.

5.4 Meeting legal and regulatory obligations

We may process information to meet obligations relating to:

- accounting and taxation;
- customs and import-export formalities;
- transport and shipping regulations;
- sanctions and trade restrictions;
- fraud prevention;
- insurance;
- record-keeping;
- regulatory and authority requests.

Legal basis: compliance with a legal obligation.

5.5 Managing disputes and legal claims

We may process and retain relevant information to:

- handle complaints;
- investigate incidents;
- manage insurance claims;
- recover debts;
- respond to legal proceedings;
- establish, exercise or defend legal claims.

Legal basis: our legitimate interest in protecting our rights and business interests.

5.6 Operating and securing the website

Technical data may be processed to:

- deliver website content;
- maintain website functionality;
- detect and prevent fraud, abuse and security incidents;
- diagnose technical problems;
- maintain service continuity;
- generate aggregated technical statistics.

Legal basis: our legitimate interest in operating, maintaining and securing the website.

5.7 Analytics and non-essential technologies

If the website uses analytics, advertising or other non-essential technologies, the relevant data will be processed after the user has provided consent where consent is legally required.

Legal basis: consent.

Consent may be withdrawn or modified at any time through **[insert cookie preference mechanism]**.

5.8 Marketing communications

If Extra Rail Service offers newsletters or promotional communications, professional contact details may be used for marketing only where there is an appropriate legal basis.

Legal basis: consent or another basis permitted under applicable law.

Where consent is required:

- the marketing option will be separate from the service enquiry;
- consent will be optional;
- a refusal will not prevent users from requesting a quotation;
- consent may be withdrawn at any time.

Withdrawing consent does not affect processing lawfully carried out before withdrawal.

6. Requirement to Provide Personal Data

Fields marked as mandatory in the contact or quotation form are required so that we can evaluate and respond to the request.

If essential information is not provided, such as contact details, the collection point, destination or cargo information, we may be unable to:

- assess the enquiry;
- prepare a quotation;
- identify an appropriate transport solution;
- contact the requester;
- provide the requested logistics service.

Information used only for optional analytics, advertising or marketing purposes is not required to submit a service enquiry.

7. Recipients of Personal Data

Where necessary for the purposes described in this Privacy Policy, personal data may be disclosed to:

- companies within the Extra Rail Service group involved in the enquiry or service;
- road, railway and sea carriers;
- freight forwarders and logistics operators;
- warehouses, consolidation hubs and terminal operators;
- customs agents and customs authorities;
- port, railway and transport infrastructure operators;

- local collection and delivery partners;
- insurers and insurance brokers;
- banks and payment-service providers;
- accounting, legal and professional advisers;
- IT, cloud, hosting, website-management and cybersecurity providers;
- email and business-communication providers;
- online-form and document-management providers;
- public authorities, regulators, courts and law-enforcement bodies where required by law.

Recipients receive only the information reasonably necessary to perform the relevant task or fulfil the applicable obligation.

Service providers processing personal data on our instructions will act as data processors and will be subject to appropriate contractual obligations. Other recipients may act as independent controllers when they determine their own purposes and methods of processing.

8. Microsoft Forms and Other Digital Platforms

The current online quotation process is linked to a form hosted through Microsoft Forms. [\[ERS Logistic\]](#)

When individuals submit information through a Microsoft Forms form, the information may be processed using Microsoft cloud services on behalf of the data controller.

Extra Rail Service should ensure that:

- access to submitted responses is limited to authorised personnel;
- form responses are retained only for as long as necessary;
- the relevant contractual data-protection terms are in place;
- security and access permissions are reviewed periodically;
- the storage location and any international transfers are appropriately managed;
- obsolete submissions are deleted or securely archived in accordance with the applicable retention rules.

The contact or quotation form should display a short privacy notice and a direct link to this Privacy Policy at the point where personal data is collected.

9. International Data Transfers

Extra Rail Service provides and coordinates international freight services, including routes involving countries outside the European Economic Area.

Personal data may therefore be transferred or disclosed to carriers, customs representatives, freight forwarders, service providers, delivery partners or public authorities located outside the EEA when necessary to:

- evaluate the requested route;
- prepare a quotation;
- arrange collection, transport or delivery;
- complete customs or regulatory procedures;
- perform the requested logistics service.

Where personal data is transferred outside the EEA, Extra Rail Service will use an appropriate transfer mechanism where required, which may include:

- a European Commission adequacy decision;
- European Commission Standard Contractual Clauses;
- binding corporate rules, where applicable;
- another legally recognised safeguard;
- a specific GDPR derogation applicable to the circumstances.

Where appropriate, supplementary technical, contractual or organisational protections will be used.

Information about the applicable transfer safeguard may be requested through **[privacy email address]**.

10. Data Retention

Personal data will be retained only for as long as necessary for the purposes for which it was collected and to comply with applicable legal, accounting, customs, transport and regulatory obligations.

The applicable retention period will depend on the category of information and the reason for processing.

Extra Rail Service applies or will establish retention periods for:

- general enquiries;
- quotation requests that do not result in a contract;
- customer and contractual records;
- shipment and delivery records;
- customs and transport documentation;
- invoicing, accounting and tax documentation;
- complaints, incidents, disputes and legal claims;
- website and security logs;
- consent records;
- marketing contact information.

Where a precise period cannot be established in advance, the retention period will be determined using criteria such as:

- the duration of the customer or supplier relationship;
- the time necessary to respond to the enquiry;
- the validity of the quotation;
- contractual requirements;
- statutory record-keeping obligations;
- applicable limitation periods;
- the need to establish, exercise or defend legal claims;
- security and fraud-prevention requirements.

At the end of the applicable retention period, personal data will be securely deleted, anonymised or archived where continued retention is required by law.

11. Data Security

Extra Rail Service uses appropriate technical and organisational measures designed to protect personal data against:

- unauthorised access;
- accidental or unlawful loss;
- alteration;
- unauthorised disclosure;
- destruction;
- misuse;
- unavailability.

Depending on the nature of the processing, these measures may include:

- access controls;
- authentication mechanisms;
- role-based permissions;
- secure cloud services;
- backup and recovery procedures;
- staff confidentiality requirements;
- security updates;
- vendor controls;
- procedures for managing security incidents.

No method of transmitting or storing information can be guaranteed to be completely secure. Individuals should therefore avoid sending unnecessary confidential, sensitive or special-category information through the website form.

12. Data-Protection Rights

Subject to the conditions and limitations established by the GDPR, individuals may have the right to:

- obtain confirmation of whether their personal data is being processed;
- request access to their personal data;

- request correction of inaccurate or incomplete personal data;
- request deletion of personal data;
- request restriction of processing;
- receive certain personal data in a structured, commonly used and machine-readable format;
- request transmission of eligible data to another controller where technically feasible;
- object to processing based on legitimate interests;
- object to direct marketing at any time;
- withdraw consent where processing is based on consent;
- obtain information about safeguards used for international transfers;
- lodge a complaint with a competent supervisory authority.

The GDPR covers access, rectification, erasure, restriction, portability, objection and protections relating to automated individual decision-making. [\[eur-lex.europa.eu\]](http://eur-lex.europa.eu)

Requests may be submitted to:

[privacy email address]

The request should include enough information to enable Extra Rail Service to identify the relevant personal data and respond appropriately.

We may request reasonable additional information where necessary to verify the identity of the individual submitting the request. Requests will be handled in accordance with the time limits and conditions established by applicable data-protection law.

13. Right to Object

Where personal data is processed on the basis of legitimate interests, individuals may object to the processing for reasons relating to their particular situation.

Following an objection, we will stop the relevant processing unless:

- we demonstrate compelling legitimate grounds that override the individual's interests, rights and freedoms; or
- the processing is necessary for the establishment, exercise or defence of legal claims.

Individuals may object to direct marketing at any time. If such an objection is made, personal data will no longer be processed for direct-marketing purposes.

14. Right to Lodge a Complaint

Individuals have the right to lodge a complaint with a competent supervisory authority if they believe their personal data has been processed in breach of applicable data-protection law.

In Italy, the relevant supervisory authority is:

Garante per la protezione dei dati personali

Piazza Venezia 11

00187 Rome, Italy

Telephone: +39 06 696771

Email: protocollo@gpdp.it

Certified email: protocollo@pec.gpdp.it

The Italian authority identifies itself as the supervisory authority responsible for monitoring the application of the GDPR in Italy and publishes the contact details above. [\[garanteprivacy.it\]](http://garanteprivacy.it)

The right to lodge a complaint does not affect any other administrative or judicial remedy available under applicable law.

15. Automated Decision-Making

Extra Rail Service does not use information submitted through the website contact or quotation form to make decisions based solely on automated processing that produce legal effects or similarly significant effects for the individual.

If this changes, this Privacy Policy will be updated to explain:

- the existence of the automated processing;
- the logic involved;
- the significance of the processing;
- the potential consequences for the individual;
- the rights and safeguards available.

16. Cookies and Similar Technologies

The website may use cookies and similar technologies to:

- provide essential website functionality;

- maintain security;
- remember user choices;
- measure website performance;
- understand website usage;
- support additional features.

Cookies may include:

- technical or strictly necessary cookies;
- preference cookies;
- analytics cookies;
- advertising or profiling cookies, if used;
- third-party cookies, if used.

Technical cookies may be used where necessary for the operation of the website. Non-essential cookies and tracking technologies will be used only after consent where applicable.

The Italian Data Protection Authority states that installing non-exempt cookies requires an active form of user consent and that a preselected checkbox is insufficient. [\[garanteprivacy.it\]](https://www.garanteprivacy.it)

Detailed information about the cookies and technologies actually used, their providers, purposes, duration and consent requirements should be provided in a separate **Cookie Policy**.

Users should be able to withdraw or modify their cookie choices through **[insert cookie settings link or mechanism]**.

17. Third-Party Websites

The website may contain links to external websites, including websites operated by:

- other companies within the wider group;
- customers, suppliers or business partners;
- transport or logistics partners;
- social-media platforms;
- external service providers.

Those websites operate under their own privacy notices, cookie policies and terms.



Extra Rail Service is not responsible for the privacy practices or content of independent third-party websites. Individuals should review the relevant privacy information before submitting personal data to an external website.

18. Children's Personal Data

The website and the services offered by Extra Rail Service are intended for companies, professionals and adult users.

The website is not directed to children, and Extra Rail Service does not knowingly seek to collect personal data from children through its contact or quotation forms.

If Extra Rail Service becomes aware that a child's personal data has been submitted without an appropriate legal basis, reasonable steps will be taken to delete the information.

19. Changes to This Privacy Policy

Extra Rail Service may update this Privacy Policy to reflect changes in:

- website functionality;
- contact and quotation forms;
- service providers;
- processing activities;
- logistics operations;
- legal or regulatory obligations;
- official data-protection guidance.

The updated version will be published on this page and will indicate the latest revision date.

Where a change materially affects how personal data is processed, an additional notice will be provided where appropriate.

20. Contact Us

For questions about this Privacy Policy, the processing of personal data or the exercise of data-protection rights, contact:

[Full legal company name]

Trading as: **Extra Rail Service**

Registered office: **[full registered address]**

Privacy enquiries and rights requests: **[privacy email address]**



General email:[general contact email]

Telephone:[telephone number]