



DATA PRIVACY POLICY

Cod. PO.06.20

Rev. 0

Data:04.09.2020

Scope: This Policy applies to GATTO GROUP and its subsidiaries (collectively the “Company”) and the directors, officers and employees of such entities as well as those acting for or on behalf of such entities.

Purpose: It is GATTO GROUP’s policy to protect the confidentiality of personal data in compliance with applicable law.

Policy: As stated in the Company’s Code of Conduct, GATTO GROUP is committed to collecting, maintaining and processing personal data in compliance with all applicable laws. To this end, the Company will incorporate an appropriate level of security in the information technology systems it selects and uses to collect, maintain and process personal data.

Toward that end:

- The Company will process the personal data belonging to employees, contractors, suppliers, customers and others in compliance with applicable laws in force in the countries where the Company operates, and shall create a “protected environment” in order to enable, when necessary, the transfer of the personal data between the Company companies operating in different countries, to the extent permitted and in compliance with security standards set forth in applicable laws;
- Personal data shall be processed for legitimate business purposes and objectives in compliance with the principles of relevance, necessity, pertinence, accuracy and utilizing processing methods adequate to such objectives; personal data will be kept up to date and for no longer than it is necessary for the purposes for which the data was collected.

Personal data processing shall be performed in compliance with processes and procedures provided for by the Company’s system protection of company data, pursuant to which all data is classified in order to determine and perform necessary security measures;

Sensitive data (including, without limitation, data that could allow the disclosure of political opinions, sexual orientation, racial origin, health condition, etc.) and “judicial data” processing operations shall occur only when strictly necessary to pursue Company business objectives and always in compliance with applicable laws, within the limits permitted by the applicable laws and, when necessary, with the consent of the interested person;

Each interested person gives prior consent and is informed regarding the purposes of each processing operation of his/her personal data as necessary for compliance with applicable laws;



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The interested person's legal rights, such as, among others, the right to access his/her own personal data, the right to obtain the updating, rectification or integration of data, the right to cancel the data in cases provided for by applicable law shall be respected;

When required by applicable law, personal data may be disclosed to third parties, if necessary, in relation to processing purposes and subject to the interested person's consent, as required for compliance with applicable law.

Each company of the Company will oversee the relevant company's personal data processing operations. Violation of this Policy may result in disciplinary action up to and including termination of employment.

Signed by : General Manager Cristian Paravano

Date of issue : 04th Sept, 2020