

CIRCULAR OF DATA PROCESSING OF CLIENTS AND SUPPLIERS

Under Article 13 of the Regulation 2016/679 about the protection of personal data

Dear Client/Supplier,

INDUSTRIA GRAFICA EUROSTAMPA S.P.A. (in the following the “**Company**” or “**The Owner**”), as owner of the processing would like to inform You about the following, under the articles 13 and 14 of the EU General Data Protection Regulation 2016/679, concerning the protection of personal data (“**Regulation**”).

1. Type of personal data

The data processed from You, from Your staff in charge of the execution and management of the contracts with the Company, including:

- name, surname,
- contact data,
- email addresses,
- professional qualifications, if relevant,
- certificate of professional competence,
- data concerning the pay and the contributions paid and the punctuality towards your staff for the provision of services in the company,

when these data are necessary to verify the respect of the rules concerning the protection of employees, included in the procurement contracts directly provided by You, they will be processed from the Company in conformity with the Regulation and the national regulations, including measures ordered by the Control Authority, if applicable. In case of natural person suppliers, besides the above-mentioned data, data concerning the invoicing and payment (including VAT registration and tax code), bank details, enrolment to registers and economic and financial data (for example the balance sheet) might be processed as well.

2. Purposes of the processing

The data processing of the Stakeholders is processed from the Company in the performance of its economic and financial activities with the purpose of selection, establishment, management and execution of the contractual relationships (including the management of the pre-contractual relationships). In particular, the data will be processed for the fulfilment of legal obligations (e.g. tax and accounting obligations, obligations arising from procurement contracts and from regulation about health and safety at work); for the registration of the suppliers, for the administrative management of the contracts, and if included, for the management of payments and invoices, for obligations with the purpose of providing services, for the management of any litigation, for the execution of internal controls (security, productivity, quality of services, integrity of the assets) and for certification. The data of the Stakeholders might also be processed for periodical controls for the evaluation of the existence of legal and ethical requirements, established from the Company in its Code of Ethics and in the context of the audits, and they may be processed in Your head office, concerning quality, process, product or sustainability. For the above-mentioned purposes a specific consent is not necessary, because the Company can use the exemptions in the articles 6.1 b), 6.1 c) of the Regulation.

In case of suppliers-natural persons the Company uses the exemption exposed in 6.1 f) for the processing of economic and financial data, such as commercial information and balance sheet (legitimate interest of the Company in verifying the economic-financial solidity of its trading partners).

3. Provision of data and modalities of the processing

The provision of data of the Stakeholders is necessary and, without it, it will not be possible to create any commercial relationships, to perform proper pre-contractual and contractual obligations or, if there is already a relationship, to fulfil obligations and commitments, which come from it.

The data of the Stakeholders will be processed by the Company and the authorised staff through electronic or manual systems, following the principles of correctness, loyalty and transparency provided for in the regulation concerning the protection of personal data and protecting the discretion of the subject, to whom the data refer, through technical and organisational security measures in order to guarantee an adequate security level (for example by forbidding the access to non-authorised subjects, except when it is compulsory by law, or through the ability of resetting the access to the data in case of physical or technical problems).

4. Data storage

The data will be stored in conformity with the regulation about the protection of personal data for all the time needed in order to fulfil the above-mentioned purposes. In particular, the data will be stored throughout the commercial relationship and even after the cessation of it, meeting the requirement for civil and tax obligations (for example the civil obligation of storing invoices and business documents at least for 10 years). The data acquired during the selection process, if there isn't any further contractual relationship with the Company, will be stored for 5 years after their acquisition.

5. Communication, dissemination and transfer of data

Despite the communication provided in order to fulfil the legal and contractual obligations, the data might be provided to tax or legal consultants, collaborators of the Company, banking institutions, public bodies and administrations if necessary, or to subjects entitled by law to receive this information, Italian or foreigner legal authorities and other public authorities, with the purposes of fulfilling legal obligations, or for the performance of the obligations assumed and derived from the contractual relationship, including the need of defence in court proceedings. These subjects act as autonomous Owners of the processing.

The contact data may be occasionally processed to other clients and/or suppliers of the Company, for example if they have to collaborate with these subjects with the purposes of performing contractual obligations. The Company avails of third parties for the provision of specific services, which require the data processing, for example the suppliers for services for compliant archiving or quality, process and product audits. These subjects act as manager of the processing, following specific instructions which are adequate to the modalities of processing and to the security measures explained in the specific contractual documentation. The full and updated list of subjects who use personal data as managers of the processing is available on request at the Company, at the following contacts.

The data might be provided to other companies of the group, including the subsidiaries with registered office inside or outside the European Union (whose updated list is available at the contact addresses), if necessary with the purposes of internal administration and group coordination and if these subsidiaries have to cooperate in order to fulfil contractual obligations. In this case, referring to the transfer outside the

European Union, the Company commits to guarantee levels of protection and safeguard also of contractual elements, which are adequate to the regulations, including standard contractual clauses (it will be possible to ask for a copy of the commitments made with the Group Companies in the context of these clauses through request at the Company at the addresses given below). Personal data will not be disseminated.

6. Right of the Stakeholders

With regard to the data processing described above, the Stakeholders will be able to exercise the rights provided for in Regulation (articles 15-21), including the right:

- To receive confirmation of the existence of their data and to access to their content (access rights);
- To upload, modify and/or correct their personal data (rights of rectification);
- To ask for cancellation or limitation of the processing of data, which infringed the law, including data for which the storage is not necessary in relation to the purposes why data have been collected or processed (right to be forgotten and right to limitation);
- To object to the processing, unless the processing is provided for by law, in the cases explained by the Regulation (right to object);
- To revoke the consent, if given, without prejudice to the lawfulness of the processing based on the consent given before the revocation;
- To receive an electronic copy of data about them, given in the context of the contract and to ask that these data are transferred to another owner of the processing (right to data portability).

In order to exercise these rights or for further information relating to this regulation, the Stakeholders might address the Owner of the processing, writing an email to: privacy@eurostampa.com.

The Stakeholders may also lodge a complaint with the supervisor Authority in case of violation in terms of the protection of personal data.

7. Identity and contact information of the Owner and contact information of the Manager of the Protection of Data

The Owner of the processing of personal data is **INDUSTRIA GRAFICA EUROSTAMPA S.P.A.** with registered office in VIALE RIMEMBRANZA, 20 - 12041 BENE VAGIENNA (CN) - ITALY, in the person of its Legal Representative.

The Owner of the processing of personal data invites his Clients and Suppliers to inform the Stakeholders (e.g. administrators, employees and collaborators, whose data the Company owns with the purposes of the performance of the contract) about the content of this Regulation.

The Owner of the Processing of Personal Data: