



POLICY ON PROCESSING DATA AND SENSITIVE INFORMATION

Publication date 09/12/2024

Version No. 1

Contents

1.	INTRODUCTION.....	3
2.	THE CONTROLLER	3
3.	SCOPE OF APPLICATION.....	3
4.	PRINCIPLES.....	3
5.	TYPE OF DATA PROCESSED	4
6.	REGULATORY REFERENCES	4
7.	PURPOSES FOR AND LEGAL BASIS OF PROCESSING	4
8.	MANDATORY OR OPTIONAL NATURE OF PROVIDING DATA AND THE CONSEQUENCES OF REFUSING TO PROVIDE THE SAME.....	5
9.	PROCESSING METHODS AND DURATION	6
10.	COMMUNICATING DATA.....	6
11.	TRANSFERRING DATA	6
12.	A DATA SUBJECT’S RIGHTS	7
13.	THE ROLES AND RESPONSIBILITIES OF THE PARTIES INVOLVED	7
13.1	APPROVAL AND REVIEW	7
13.2	DISSEMINATION	8
14.	GLOSSARY	9

1. INTRODUCTION

The METLAC Group and its companies, pursuant to article 13 of EU Regulation 2016/679 (the “Regulation”), hereby notify every interested party that personal data and sensitive information will be processed exclusively for the purpose of establishing, developing and managing the business relationship in question, in accordance with the principles of correctness, lawfulness and transparency, safeguarding confidentiality, and in compliance with the aforementioned legislation. Specifically, the METLAC Group undertakes to respect the privacy of customers, suppliers, employees and all those parties with whom it has a business relationship, guaranteeing high standards of protection in the processing of personal data, whether this data relates to internal personnel or external users.

2. THE CONTROLLER

The Controller is METLAC SPA, with registered office at S.S. 35 Bis dei Giovi, 53, postcode 15062, Bosco Marengo (AL), Italy and, as the case may be, its subsidiaries.

3. SCOPE OF APPLICATION

This Policy applies to all the personal information collected, stored, used or otherwise processed by the METLAC Group, in any format whatsoever, including computerised documents, electronic information and paper documents. This Policy also applies to agents and contractors who handle and process personal information on behalf of the METLAC Group. This Policy applies, without distinction, to every level of the company.

4. PRINCIPLES

Personal data is processed in the METLAC Group in full compliance with the rights and confidentiality of the Data Subjects. Data is processed in a lawful, transparent and confidential manner and the following principles are adopted:

- **Purpose and limitation:** Personal data is collected and processed exclusively for specific and legitimate purposes, which must be clearly defined before collection. Subsequent modifications to the original purposes for which data is collected are only allowed if strictly related to the initial purposes.
- **Proportionality and necessity:** The processing of data must be appropriate, relevant and limited to that which is necessary to achieve the stated purposes. Data must not be collected in excess of that which is required.

- **Transparency:** Data Subjects are clearly and adequately informed about the processing of their personal data, guaranteeing them the right to be aware of the methods by which and the purposes for which their data is processed.
- **Data minimisation and quality:** The data processed must be essential for the purposes pursued. It is essential that this data is accurate, complete and up-to-date, with measures taken to correct or delete incorrect or incomplete data.
- **Confidentiality and security:** The data must be protected from unauthorised access, guaranteeing the confidentiality and integrity of the information. Access to the data is limited to those parties who are authorised to process it for business reasons.

5. TYPE OF DATA PROCESSED

Processing may involve common personal data, identifying data and contact data, such as - purely by way of example and not limited to - identifying data (first name, last name, telephone number, email address, date of birth, education and employment history, photographs attached to a curriculum), other data and information relating to business activities between the parties.

The METLAC Group advises Data Subjects not to provide special categories of data pursuant to article 9 of the Regulation (i.e. data that could reveal their state of health, origin, religious beliefs, political opinions, sexual orientation), without prejudice to the case in which the aforementioned data must be disclosed by virtue of an employment relationship, with particular reference to whether the Data Subject belongs to a protected category and to any medical examinations required for recruitment.

6. REGULATORY REFERENCES

- Articles 9, 13, 14, 15, 21, 22 and 28 of EU Regulation 2016/679 (the *General Data Protection Regulation* - GDPR), the European Union's fundamental legislation on the protection of personal data;
- Italian Legislative Decree no. 196/2003 (the Privacy Code), which governs the processing of personal data and implements European regulations;
- Italian Legislative Decree no. 101/2018, which adapts the Italian Privacy Code to EU Regulation 2016/679;

7. PURPOSES FOR AND LEGAL BASIS OF PROCESSING

Personal data collected by the organisation as a result of:

- unsolicited submission or in response to a job posting,
- work activity with exchange of information and documentation aimed at the business,
- compilation of questionnaires administered by the METLAC Group aimed at carrying out surveys on health, safety, the environment, sustainability, satisfaction index of the services provided,
- involvement and dialogue with Stakeholders for practices related to the sustainable development of the METLAC Group and its supply chain,
- access to the METLAC Group's plants and offices and for access control, recording a stay within the Group's premises, the security of the premises as well as the people present therein,

will be processed for the purposes strictly related to the performance of business activities, to follow up requests made by a Data Subject or to receive input to positively conclude an existing transaction.

8. MANDATORY OR OPTIONAL NATURE OF PROVIDING DATA AND THE CONSEQUENCES OF REFUSING TO PROVIDE THE SAME

Providing the personal data requested is optional. Depending on the type of collaboration relationship with the Stakeholder involved, the following specific cases might arise.

- *PERSONNEL RECRUITMENT*: Failure to communicate data that is subsequently and potentially requested by the METLAC Group might make it impossible to proceed with verifying the conditions for hiring someone and/or with starting a collaboration relationship and, therefore, with potentially establishing an employment relationship.
- *COMMUNICATION WITH STAFF*: Communicating personal data is compulsorily, as it is necessary to establish, develop and manage the employment relationship and to allow the METLAC Group to fulfil tax and social security obligations, as required by current regulations, promptly and to comply with the obligations deriving from current regulations as well as any applicable national collective bargaining agreement (CCNL).
- *COMMUNICATION WITH CUSTOMERS*: Providing personal data is mandatory in order to fulfil per-contractual and contractual obligations. Any refusal to provide the necessary personal data may make it impossible to proceed with a contractual relationship.
- *COMMUNICATION WITH SUPPLIERS*: Providing personal data is mandatory in order to fulfil per-contractual and contractual obligations. Any refusal to provide the necessary personal data may make it impossible to proceed with a contractual relationship.
- *COMMUNICATION WITH SHAREHOLDERS*: Providing personal data is mandatory, while it is optional where processing is subject to the Data Subject's consent. Any refusal to provide personal data may make it impossible for the METLAC Group to carry out its tasks.
- *INTERACTIONS WITH VISITORS*: Providing personal data is mandatory and any refusal to provide personal data may result in access to the METLAC Group's premises and offices being denied.

9. PROCESSING METHODS AND DURATION

Personal data will be processed by specialist personnel, duly appointed by METLAC SPA, within the limits of that which is strictly necessary, in a lawful, correct way, with or without the use of electronic or automated means. This will include all the operations or the set of operations necessary for the processing in question, including the recording and storing of data in the organisation's archives (or on the servers of the software house) and security measures will be adopted to guarantee the confidentiality of data and to avoid undue access by third parties or unauthorised personnel.

Data may also be collected from third parties, in which case the METLAC Group will promptly inform Data Subjects, as provided for in article 14 of the Regulation.

Data will be kept for the period necessary to achieve the purposes for which it was collected and will be processed for the period of time necessary to manage the activity, practice or process in question, except in more specific situations such as, for example, establishing an employment relationship, for which personal data may be kept for a period equal to or greater than that of the employment relationship.

10. COMMUNICATING DATA

Personal data may be disclosed to employees, contractors and collaborators but, in any case, only to personnel duly authorised by the METLAC Group for the purposes of the business relationship in question.

Personal data or other sensitive information may be disclosed to third parties, such as service providers, tax consultants, employment consultants and legal advisers, duly identified for the purposes listed above, who will act as Processors pursuant to article 28 of the Regulation, on behalf of the METLAC Group and in accordance with its instructions.

The aforementioned parties will act as Autonomous Controllers or as Processors on behalf of the METLAC Group and in accordance with its instructions. An updated list of Processors is available from the parent company of the METLAC Group, METLAC SPA, located at S.S. 35 Bis dei Giovi, 53, postcode 15062 Bosco Marengo (AL), Italy, or by email at privacy@metlac.com.

11. TRANSFERRING DATA

Personal data and other sensitive information will not be transferred to another European Union country or a non-EU country (including the USA). The METLAC Group shall ensure that, should any transfer of data be done outside the EU, it will be done on the basis of adequate guarantees, in accordance with the applicable legal provisions and that all necessary measures shall be taken

to ensure the adequate protection of personal data, such as the *Standard Contractual Clauses* approved by the European Commission or other equivalent guarantees.

12. A DATA SUBJECT'S RIGHTS

The METLAC Group hereby informs every interested party that, pursuant to articles 15-22 of the Regulation, Data Subjects have the right:

- to access the personal data that concerns them;
- to receive confirmation of the existence or not of this same data and to know of its content and origin;
- to obtain the rectification, updating or deletion of the same;
- to oppose the processing of this data or to request that processing of it be restricted;
- to data portability;
- to withdraw their consent at any time, where provided: withdrawing consent shall not affect the lawfulness of the processing carried out previously based on the consent given before the withdrawal, and to oppose processing of data for marketing and/or profiling purposes pursuant to article 21 of the Regulation;
- to file a complaint with a Supervisory Authority (in Italy this is the Italian Data Protection Authority).

These rights may be exercised by sending a written notice to the Controller, METLAC SPA, with registered office at S.S. 35 Bis dei Giovi, 53, postcode 15062, Bosco Marengo (AL), Italy or by emailing: privacy@metlac.com.

13. THE ROLES AND RESPONSIBILITIES OF THE PARTIES INVOLVED

13.1 APPROVAL AND REVIEW

This Policy document was prepared by METLAC SPA in November 2024. This version has been approved by the METLAC Group's Board of Directors. The structure of the document complies with the requirements of European standards (the CSRD).

The METLAC Group reserves the right to modify or simply update the contents of this Policy and the Disclosures aimed at the various parties with whom it interacts, partly or completely, as a result of changes in the applicable legislation or the needs of the organisation. Any new documents, in order to be considered valid, shall be submitted to and approved by the Board of Directors. They shall then be communicated to Data Subjects and interested parties promptly, through the company's normal communication channels (electronically, the corporate website, the QHSE&S portal).

It is the responsibility of each company department to ensure compliance with this Policy when processing personal information and to report any non-compliance or breach.

13.2 DISSEMINATION

This Policy is published in the Sustainability section of the METLAC Group's institutional website, together with the Sustainability Report within which the company's social, environmental and economic performance is reported transparently [<https://www.metlac.com/sostenibilita/>].

CEO
Pier Ugo Bocchio



General Manager Italy
Enrico Buriani



CRO
Guido Chiogna



14. GLOSSARY

Decree 2016/679: This governs the processing of sensitive personal data and information by organisations, companies and individuals. This European Union Decree on the processing of personal data and privacy replaced that of 10 August 2018 no.101. The most important introduction is the principle of the Controller's *accountability*, that is, the Controller's responsibility with regard to the measures, both organisational and technical, put in place to comply with the GDPR, that is, the *General Data Protection Regulation*. With this regulation, the European Commission aims to strengthen the protection of the personal data of European Union (EU) citizens and EU residents, both within and outside the EU's borders, giving citizens back control of their personal data, simplifying the regulatory context concerning international affairs and unifying and standardising privacy legislation within the EU.

Article 9 of EU Regulation 2016/679: This governs the processing of special categories of data such as racial origin, ethnicity, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data and data relating to health or sexual orientation. This data must not be processed unless the Data Subject has given their explicit consent or in order to fulfil some well codified obligations (page 2).

Article 13 of EU Regulation 2016/679. 1: In the event that sensitive data is collected, the Controller shall provide the Data Subject with the identity and contact details of the Controller, the Data Protection Officer and the purposes for which such data is processed as well as the legal basis for such processing. In addition, the Controller shall provide the Data Subject with information regarding the retention period of the personal data, the existence of the Data Subject's right to request access from the Controller to the personal data that concerns them as well as to have this data rectified or erased and to restrict processing of it or to oppose such processing, as well as the right to data portability. Should the Controller intend to process the personal data for any purpose other than that/those for which the data was collected, prior to such additional processing, the Controller shall provide the Data Subject with information regarding this additional purpose (page 2).

Article 14 of EU Regulation 2016/679: This covers the information to be provided if the personal data is not provided directly to the METLAC Group but to another authorised third party. The same procedures introduced by article 13 (page 2) are to be considered.

Article 15 of EU Regulation 2016/679: This refers to the right to obtain confirmation from the Controller as to whether personal data concerning the Data Subject is being processed and, if so, to obtain access to the personal data and information provided to the organisation to carry out a specific task (page 4).

Article 21 of EU Regulation 2016/679: This refers to the Data Subject's right to object, at any time, for reasons related to their particular situation, to the processing of the personal data that concerns them (page 5).

Article 22 of EU Regulation 2016/679: Data Subjects have the right not to be subject to a decision based solely on the automated processing of sensitive data and information, including profiling, which produces legal effects concerning them or which similarly significantly affects them (page 4).

Article 28 of EU Regulation 2016/679: Where processing is to be carried out on behalf of the Controller, the Controller shall only use Processors who have sufficient safeguards in place and appropriate technical and organisational measures so that the processing meets the requirements of this Regulation and ensures the protection of the Data Subject's rights (page 4).

Supervisory Authority: The body created to supervise the activities carried out under a monopoly regime or characterised by a special general interest (page 5).

CCNL: The Italian National Collective Bargaining Agreement (page 3).

CSRD. The *Corporate Sustainability Reporting Directive* is the new European Commission Directive. Its objective is to establish a new framework for non-financial reporting by companies on their environmental, social and governance impacts (page 7).

Italian Legislative Decree no. 196/2003: The Italian Privacy Code containing the provisions for adapting domestic law to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (page 2).

Italian Legislative Decree no. 101/2018: The provisions for adapting domestic legislation to the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the General Data Protection Regulation) (page 2).

Disclosure: A set of information relating to a specific subject and collected in a document, in this specific case regarding the processing of personal data and/or sensitive information concerning a Data Subject, be they a natural or legal person, which the organisation, as part of its business activities and for the purposes of fulfilling the activities themselves, may request, store and manage.

Personal information: Information about a person - also called Personally Identifiable Information (PII) or personal data - or any information that could be used to directly or indirectly identify a person. This information includes any detail that allows a Data Subject to be identified, whether it is used individually or whether it is combined with other available or potentially available data such as a Data Subject's name, address, email address, identification number, or information on salary and benefits. There is no distinction between personal information concerning a Data Subject's private life, public sphere or work environment, as all this information is covered by this Policy.

Sensitive personal information: This refers to personal information that might reveal a medical or health condition, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information concerning a Data Subject's sex life or sexual orientation.

Marketing: The set of techniques designed to make goods and services available to the consumer and the user in a given market in the most suitable time, place and manner, at the lowest costs for the consumer whilst being profitable for the company (page 5).

QHSE&S: The portal running on the company intranet where documentation relating to the quality, health and safety, environment and sustainability management systems are managed and stored. Personnel working at METLAC Group companies, depending on their function, have free access to this documentation.

Server: In computing terms, a high-performance device which, in a network, provides a service to other connected computers, called clients. It can be used for data exchange and storage (page 4).

Software house: A company that develops and markets computer programs (page 4).

Stakeholder: Any individual, group or organisation which has an interest or is affected, directly or indirectly, by a company's activities or decisions (page 3).

Standard Contractual Clauses: Pre-approved, standard documents that contain the minimum requirements to be met when transferring data abroad and that can be used both on the basis of the GDPR and by EU institutions, bodies and agencies (page 4).

Sustainable Development: The adoption of methods designed to respond to the needs of the present and those of the future, reconciling environmental well-being, social equity and economic vitality to create thriving, healthy, diverse and resilient communities (page 3).

Processing: Any operation or series of operations performed on personal information, including through automatic and computerised means.