

## Data Protection Policy

Industrie De Nora S.p.A. (*hereinafter "IDN" or the "Company"*) is aware of the importance of protecting the personal data of its clients and providers. In compliance with the European and national legislation on the matter, IDN informs that data related to individuals and legal entities will be collected and processed according to the law on personal data protection.

Therefore, with reference to the methods of management and processing the data contained in the present agreement, pursuant to Article 13 of Regulation (EU) no. 2016/679, IDN provides the following information.

### 1. Types of data collected

*Data provided deliberately by individuals and legal persons*

At the time of execution and during the performance of the agreement, IDN processes data of individuals and legal persons. In particular, it collects and processes:

- personal data
- contact data
- tax data
- any other data required to fulfil the agreements.

### 2. Purpose and legal basis of the processing

Personal data provided by customers and collected by IDN will be processed for the following purposes:

- a. to fulfil the obligations set in the agreement. The legal basis that legitimizes such processing is art. 6 par. 1, lett. b) of the Regulation (EU) no. 2016/679, as it is necessary to perform the contract;
- b. to discharge obligations laid down by law. The legal basis that legitimizes such processing is art. 6 par. 1, lett. c) of the Regulation (EU) no. 679/2016, or as it is necessary to fulfil a legal obligation to which the data controller is subject;
- c. to communicate data within its group for administrative purposes. The legal basis that legitimizes such processing is art. 6 par. 1, lett. f) of the Regulation (EU) no. 679/2016, or as

it is necessary for the pursuit of the legitimate interest of the controller in sharing information for administrative purposes within its group;

- d. to assert or defend a right in court. The legal basis that legitimizes such processing is art. 9 par. 2 lett. f) of Regulation (EU) no. 679/2016, or as it is necessary to ascertain, exercise or defend a right in court.

### **3. Data retention period**

The data collected and processed by IDN for the purposes of which 2.a, 2.a, 2.c and 2.d will be retained for all the time necessary to perform the contracts and then immediately removed, with the exception of those necessary to comply with fiscal, accounting, social security, health, welfare and administrative regulations or to fulfil other legal obligations and document the activities performed. The data will be deleted in the terms provided for by the aforementioned regulations.

### **4. Modalities for data processing**

The data collected will be processed and stored with electronic tools and will be saved both electronically and on paper, organized in a database, and on any other type of appropriate support.

Specific security measures are followed to prevent data loss, illicit or incorrect use and unauthorized access.

The processing of data carried out by IDN does not involve automated decision-making processes.

### **5. Reporting and providing data**

The Communication and / or provision of personal data is a necessary requirement to perform the contract between IDN and the other part and therefore mandatory for the purposes referred to in the points 2.a, 2.a, 2.c and 2.d of this policy: the lack of communication and / or provision of data, for these purposes, will make it impossible to fulfil the obligation set therein.

### **6. Entities to whom the data may be communicated**

The data collected will not be disseminated and may be communicated, not only to subjects who are entitled and have the interest to access to your personal data by law or secondary and / or EU legislations, but also, to the Data Controller's internal staff, as well as to companies, associations or professional offices that provide services and activities, on behalf of the Data Controller, as Data Processors for the fulfilment of legal

obligations, as well as for every organizational and administrative need necessary to provide the services requested. The names of the subjects who can learn about your data as "Data Processors" are listed in an updated list available at IDN premises (to be requested at the addresses indicated in point 9).

#### **7. Transfer of data to entities located outside the European Union or to international organizations**

IDN does not usually transfer the data related to individuals and legal persons processed for the purposes indicated in this policy in countries located outside the European Union or to international organizations. However, IDN could transfer to its subsidiaries located in countries outside the EU the data processed pursuant to this agreement, according to art. 49, par. 1, lett. b of the Regulation (EU) no. 679/2016, or as the transfer is necessary to perform this agreement or the pre-contractual measures requested by the data subject.

#### **8. Rights of the person to which the data refer**

In relation to the above-mentioned data processing, data subjects have the right to exercise at any time the rights provided for by Regulation (EU) no. 679/2016, including, for example, to obtain the indication:

- of the data source;
- of the purposes and methods of processing;
- of the logic applied in case of processing carried out with the aid of electronic instruments;
- identifying details of the controller, of the processor, of the managers and the appointed representative.

Data subjects have the right to obtain:

- access, updating, correction or integration of data;
- deletion, transformation into anonymous form or blocking of data processed in violation of the law;
- the limitation of data processing

Data subjects might also request a copy of their data in standard format.

**Data subjects are also entitled to object, in whole or in part:**

- for legitimate reasons the processing of data concerning them, even if pertinent to the purpose of the collection;**
- to the processing of personal data concerning them in accordance with art. 6, paragraph 1, letter e. ("processing is necessary for the performance of a task carried out in the public interest or in the**



*exercise of official authority vested in the controller") and f. ("processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party"), included profiling; - to the processing of personal data concerning them for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.*

Data subjects have, finally, the right to revoke their consent to processing, when this is based on the hypothesis provided for by art. 6, paragraph 1, letter a. (when "the data subject has given consent to the processing of their personal data for one or more specific purposes"), or by Article 9, paragraph 2, letter a. (when the data subject has explicitly consented to the processing of such personal data for one or more specific purposes) of EU Regulation 679/2016, at any time without prejudice to the lawfulness of the treatment based on the consent given prior to the revocation.

If data subjects consider that the processing that concerns them is in violation of the legislation in force, they have the right to lodge a complaint with a supervisory authority, particularly in the Member State in which they usually reside or work, or place where the alleged violation has occurred. The Italian Supervisory Authority can be reached at the addresses [proprio its own website](#).

## **9. Data controller - Contact details**

The Data Controller is Industrie De Nora S.p.a., *via Bistolfi n. 35, 20134 – Milano, Italy, Tax No. / VAT no. IT03998870962* in the person of the legal representative pro tempore. The Company may also be contacted at the e-mail address [industriedenora@denora.com](mailto:industriedenora@denora.com) and at the PEC address [industriedenora@actaliscertymail.it](mailto:industriedenora@actaliscertymail.it).

To exercise the above rights or for any other request you can send an e-mail to [dpo@denora.com](mailto:dpo@denora.com).

The Company retains the right to update this personal data processing policy.

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*Seal and signature of acknowledgement*

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*Place, date*