

## COMPANY DATA PROTECTION POLICY

Tosetti Value SIM SpA, with registered office in Corso Marconi, no. 10 in Turin (hereinafter "**Tosetti Value**" or the "**Company**"), carries out the processing of personal data of natural persons ("**Personal Data**") in compliance with Regulation (EU) 2016/679 (hereinafter "**GDPR**") and Legislative Decree 196/2003, to ensure Data Subjects lawful, proper and transparent processing of Personal Data.

Tosetti Value acts to protect the Personal Data of the Data Subjects by adopting a series of measures including those described in this Company Data Protection Policy ("**Policy**").

The Policy is updated periodically (last revision in December 2018). Tosetti Value therefore recommends that all Data Subjects consult it on the Internet site [www.tosettivalue.it](http://www.tosettivalue.it), in order to take note of any changes relating to the processing of their Personal Data.

The Policy includes:

- (1) Identity and contact details of the Data Controller
- (2) Type of personal data, lawfulness and purpose of the processing
- (3) Processing method and security of Personal Data
- (4) Recipients of Personal Data
- (5) Transfer of Personal Data abroad
- (6) Duration of the processing
- (7) Rights of Data Subjects

### 1. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

For the processing of the Personal Data of Data Subjects, the Company operates as the Data Controller (hereinafter the "**Data Controller**").

For any need related to the processing of Personal Data by Tosetti Value, and in particular to exercise the related rights, a Data Subject may contact the Data Controller at its registered office indicated above, or write via e-mail to the following address: [dataprotection@tosettivalue.it](mailto:dataprotection@tosettivalue.it).

### 2. TYPE OF PERSONAL DATA, LAWFULNESS AND PURPOSE OF THE PROCESSING

The Data Controller, also through the data processors referred to in paragraph 4 below, collects and processes Personal Data represented by contact details (for example name, surname, business title, email address, mobile phone and/or internal corporate landline phone) of natural

**Tosetti Value S.I.M. S.p.A.**

persons (employees, consultants, contractors, suppliers, etc.) - the "Data Subjects" or the "Data Subject") involved in activities related to its commercial and contractual relationships.

The processing does not ordinarily refer to particular categories of Personal Data (defined as "sensitive" by Recital 10 of the GDPR), that is data that might reveal racial or ethnic origin, political opinions, religious or philosophical convictions, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data relating to the health or sexual life or sexual orientation of the person. The aforementioned Personal Data is processed by the Data Controller when necessary (i) for the fulfilment of legal obligations, (ii) for the implementation of pre-contractual measures, (iii) for the implementation of contracts, or, also, (iv) for the pursuit of the legitimate interests of the Company (for example relating to the performance of its institutional activity or to the protection of its subjective positions).

More precisely, processing takes place for the following purposes:

(a) purposes connected with and instrumental to the management of the contractual and pre-contractual relationships of which the Company is a party, including current and potential customer relations;

(b) purposes related to the obligations established by EC laws, regulations and legislation, as well as by instructions given by authorities authorized by law and by supervisory and control bodies (for example, obligations of adequate customer verification required by anti-money laundering legislation);

(c) administrative purposes. The provision of Personal Data for the aforementioned purposes is necessary for Tosetti Value's fulfilment of legal obligations or those deriving from contractual and/or pre-contractual relationships or the establishment and management of relations between the Company and its representatives. Failure to provide such Personal Data will make it impossible for Tosetti Value to sign and implement said contracts and relations.

**2.2** The Data Controller also processes the Personal Data of Data Subjects (such as email address, as well as videos and photos made at company or marketing events) for the following purposes: (a) information on activities of a popular, promotional and cultural nature carried out by Tosetti Value; (b) promotion and invitations to events organized by Tosetti Value, implemented by written communications, also via email, and by telephone, sending of advertising material, automated communication systems.

### **3. PROCESSING METHOD OF PERSONAL DATA**

In relation to the aforementioned purposes, the processing of Personal Data takes place in full compliance with the principles of confidentiality, integrity, correctness, minimization, accuracy, necessity, relevance, lawfulness and transparency, using manual, computerized and telematic tools strictly related to the purposes themselves and, in any case, with the application of technical and organizational measures to ensure the security and confidentiality of the Personal

Data.

Where applicable, appropriate guarantees will be provided concerning the security and confidentiality of the processing of Personal Data also by the persons referred to in par. 4.

#### **4. RECIPIENTS OF PERSONAL DATA**

Personal Data is not disclosed to the public, but may be communicated, exclusively for the purposes indicated above, to the following categories of subjects:

(A) subjects that engage in business on behalf of Tosetti Value, or for its benefit, depending on the business activity;

(B) Authorities and Supervisory Bodies, Court Authorities and in general public or private entities with public functions (such as the Bank of Italy, Consob, FIU, interbank institutions, tax authorities, securities supervisory authorities);

(C) outside companies and professionals used by Tosetti Value;

(D) third-party companies involved in the organization, implementation and communication relating to cultural and promotional initiatives (only where consent to processing has been obtained). These subjects operate, as the case may be, as autonomous controllers, co-controllers or processors. Data Subjects may request the Data Controller to list the names and contact details of the subjects belonging to the aforementioned categories to which the Personal Data have been communicated.

#### **5. TRANSFER OF DATA ABROAD**

The Data Controller does not ordinarily transfer Personal Data to countries outside the European Union. Any transfers to these countries may take place at the request of the Data Subject, also for purposes related to the implementation of an independent consultancy contract. In this case, the Data Controller will endeavour to adopt adequate protection measures, consistent with the requirements related to the request.

#### **6. RETENTION PERIOD**

Tosetti Value keeps Personal Data in its databases for the time allowed by the order, also for the protection of its subjective positions. Data Subjects may receive further information regarding the foregoing, by contacting the Data Controller, via the email address indicated in par. 1.

#### **7. RIGHTS OF DATA SUBJECTS**

Pursuant to articles 15-22 of the GDPR, Data Subjects may exercise the rights provided therein. In particular, by contacting the Data Controller as indicated in par. 1, Data Subjects

have the right to:

a. receive confirmation regarding the processing or lack thereof of Personal Data, even if not yet recorded, and receive such notice in a comprehensible form.

b. obtain, among other things, the indication (i) of the origin of the Personal Data; (ii) the purposes and methods of the processing; (iii) the identity of the Data Controller; (iv) of the recipients or categories of recipients to whom the Personal Data may be communicated or who may become aware of it, including those acting as Data Processors; (v) the categories of Personal Data in question; (vi) whenever possible, the expected retention period or the criteria used to determine it; (vii) notice of the existence of the right to request rectification, cancellation of Personal Data or limitation of the processing of Personal Data; (viii) notice of the existence of the right to object to the processing; (ix) the right to lodge a complaint with the supervisory authority; (x) the existence of an automated decision-making process, including profiling;

c. obtain: (i) the correction or integration of Personal Data; (ii) the limitation of processing, where possible; (iii) the portability of Personal Data, where applicable; (iv) the attestation that the operations referred to in numbers (i) and (ii) sub c. they have been brought to the attention, also with regard to their content, of those to whom the Personal Data have been communicated or transmitted, except in the case where this fulfilment proves impossible or involves a use of means manifestly disproportionate to the protected right;

d. obtain the cancellation of Personal Data in the cases provided for by law; on this point, the Company anticipates that there will be cases in which it will be entitled to refuse the request for deletion of Personal Data from its databases, as it is legally obliged or entitled to retain a copy;

e. to object, in whole or in part: (i) for legitimate reasons, to the processing of Personal Data, even if pertinent to the purpose of the collection; and (ii) the processing of Personal Data for the purpose of sending communications.

f. submit a complaint to the Authority for the Protection of Personal Data.

TOSETTI VALUE SIM S.P.A.

Torino, 14th December, 2018