MARSILLI PRIVACY POLICY

PRIVACY POLICY (Visitors to Company Premises)

This policy is provided pursuant to Legislative Decree 196/2003 "Code regarding the protection of personal data" (as amended by legislative Decree 101/2018, which adapted the national legislation to the GDPR - EU Regulation 2016/679) and insofar as the interested party is a visitor and accesses our company premises.

WHO IS THE CONTROLLER OF PERSONAL DATA PROCESSING

Marsilli S.p.A. (hereinafter the **"Company"**), with headquarters in Italy, Castelleone (CR), Via Per Ripalta Arpina 14.

The Company is the Data Controller of the personal data collected.

The list of the data processors is available at the above mentioned headquarters of the Company.

CONTACTS

The contact details of the Company, as data controller, can be requested at the following e-mail address: privacy@marsilli.it

WHAT PERSONAL DATA MAY BE COLLECTED

The following categories of personal data about you may be collected.

- Contact details information relating to name, address, telephone number, mobile number, e-mail address, digital signature.
- Images and video

HOW WE COLLECT PERSONAL DATA

The Company collects and processes your personal data in the following circumstances:

- Registration on our systems as a visitor, before accessing our Company premises;
- Video surveillance systems.

FOR WHAT PURPOSES MAY PERSONAL DATA BE USED

a) Security, control and management of visitors

The Company processes your contact data in order to grant access to the Company's production areas and offices and to manage your stay in the Company in the best possible way. Identification is necessary because the Company must comply with information security standards, in order to protect its corporate know-how and to comply with workplace safety standards in the event of an emergency.

b) Video surveillance activities

The Company may process personal data, such as images and videos recorded through the corporate video surveillance systems. The use of the video surveillance system was the subject of an agreement between the Company and the union representatives. The purposes of this process are:

• the protection of corporate assets

- The protection of workers/visitors' safety in the event of an emergency and their safety in certain specific areas
- Live remote viewing of the functionality of the equipment in realization phase and virtual tour of the Company.

HOW WE STORE AND PROTECT PERSONAL DATA

All your personal data is stored in both our computer and hard copy archives, or on those of our service providers for storage. They are accessible and usable according to our standards and our IT security policies.

The personnel authorized to process your data in accordance with the Privacy Policy is duly trained and authorized in function of the activities to be carried out and the tasks assigned.

The Company uses all the necessary security measures to guarantee security, confidentiality, integrity and availability of your personal data by means of a security system ISO/IEC 27001 certified.

HOW LONG INFORMATION IS STORED

We store your personal data only for the time necessary to achieve the purposes for which it was collected or for any legitimate related purpose. Therefore, if personal data is processed for two different purposes, we will store the data for a period of time equivalent to the purpose with the longer term. However, your personal data will no longer be processed for the purpose whose retention period has ceased.

The access to your personal data is limited to personnel who need to process it for relevant purposes.

Personal data that is no longer necessary, or for which there is no legal requirement for storing it, is irreversibly anonymised (and in this way it can be stored) or securely destroyed.

Below are the storage times in relation to the different purposes listed above:

a) <u>Security, control and management of visitors</u>: should it be necessary to defend ourselves or to act or submit claims against yourself or third parties, we can retain personal data that we consider reasonably necessary to process for such purposes, for the possible duration of said claim and in any case respecting the principle of minimization.

Prerequisite to processing: legitimate interests

b) <u>Video surveillance activities:</u> The recorded images may be kept for a maximum of 7 days.

Prerequisite to processing: legitimate interests and agreement with union representatives

WHO MAY WE SHARE PERSONAL DATA WITH

Your personal data can be accessed by salespersons, duly authorized employees as well as external suppliers, nominated, if necessary, as responsible for the processing of personal data and who provide support in providing computer services.

DATA PROTECTION RIGHTS AND THE RIGHT TO SUBMIT CLAIMS

Pursuant to the GDPR, the Company would also like to inform you that - where the conditions exist - you could exercise the following rights:

- to access your personal data;
- to copy the personal data you provided (so-called portability);

- to rectify data held by the Company
- to erase any data for which there is no longer a legal prerequisite for its processing;
- to revoke your consent if the processing is based on consent or if it is directly related to a direct marketing activity;
- to restrict the way your personal data is processed, within the limits required by the legislation on the protection of personal data.
- Right to object to processing when provided by the applicable legislation.

The exercise of these rights is subject to a few exceptions aimed at safeguarding public interests (for example the prevention or identification of crimes) and our interests (for example maintaining professional secrecy). Should you exercise any of the above mentioned rights, it will be our duty to verify that you are entitled to exercise this right and we will provide feedback, generally, within a month.

For any claims or complaints, you have the right to contact controlling authorities.

CHANGES TO THIS PRIVACY POLICY

The data controller reserves the right to make changes to this privacy policy at any time, giving notice to the Users on its website: www.marsilli.com

Should changes pertain to data processing whose legal basis is consent, the Data Controller if necessary, will request User's consent again.