Zignago Vetro Group Data Privacy Policy

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1. The Zignago Vetro Group - Introduction

The Zignago Vetro Group (hereafter also the “Group” or “ZV Group”), based in Fossalta di Portogruaro, is a leader in Italy and Europe in the production and marketing of glass containers for an extremely broad and diversified range of sectors, and in particular for Beverages, Food, Cosmetics and Perfumery. The Group’s Production Sites are located in Italy, France and Poland.

It is also engaged in the collection and treatment of raw glass, from municipal waste collection, through three plants located throughout Italy and uses recycled glass as its main raw material.

Zignago Vetro is part of an industrial group led by Zignago Holding, a company that operates not only in the glass industry, but also in other sectors, including wine-making and the production of electricity from renewable sources.

In order to integrate the principles of sustainability into its Business Model, the ZV Group has decided to create an ***ESG framework.*** The ESG Policy and the Ethics Code form the cornerstones of this framework, and are designed to promote the principles of legality, fairness, equality and transparency, in addition to those of sustainability.

By establishing consistent policies, the framework also seeks to govern relationships with key stakeholders in order to share and spread these principles, both within the company and externally.

The Zignago Vetro Group views protecting personal data as a fundamental value which should be central to the day-to-day activities of all Group companies. The Group adopts a personal data protection policy to promote the protection of personal data and safeguard the rights of the data subjects through procedures, policies and information and awareness-raising campaigns regarding data protection.

2. Scope and addressees

The Scope of this personal data protection policy, which applies to the data of its employees, suppliers, customers, shareholders and other users (hereafter also the “Data Privacy Policy”), is to lay down the basic principles according to which such data are processed and to identify the responsibilities of its departments and employees during personal data processing.

The ZV Group is committed to complying with applicable personal data protection laws and regulations in the countries in which it operates.

The **addressees** of this policy are all data subjects.

3. Application

This Policy applies to all Group companies, and specifically: Zignago Vetro SpA, Zignago Vetro France SaS, Zignago Vetro Polska SA, Zignago Glass Usa Inc, Vetro Revet Srl and Italian Glass Moulds S.r.l.

Each of the above companies shall operate in accordance with this Policy, without prejudice to the fact that compliance with the national law in force in the country in which the Company operates and European law, where applicable, shall prevail.

The following outlines how the Group protects the personal data processed and owned by it concerning Data Subjects (hereinafter also ("personal data").

The Zignago Vetro Group takes appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and/or accidental loss, alteration, disclosure or access, or accidental or unlawful destruction or damage thereto.

Personal data processing is therefore lawful if one of the circumstances for authorisation pursuant to the rules set out in the relevant regulation applies.

In any case, the Zignago Vetro Group will process personal data only for the purposes specifically indicated by law, subject to obtaining the relevant consent, to the extent that such consent is mandatory under applicable laws.

Except for the information required by law, the decision to provide personal data to the Zignago Vetro Group is on a voluntary basis. No negative consequences shall therefore arise from the non-disclosure of personal data for the Data Subjects, other than that, for the Zignago Vetro Group, of not being able to carry out some or all of the purposes pursued and, for the data subjects, the inability to use the functions and tools or access systems that require the use of such personal data.

In this regard, it should be noted that each Data Subject will be responsible for any indication of personal data, for being aware of the information contained in this privacy policy, and for providing consent to the sharing of information with the Zignago Vetro Group.

4. General principles relating to processing of personal data

The ZV Group is committed to respecting and ensuring compliance with the following general principles of personal data processing:

- **Lawfulness, correctness and transparency**

  Personal data must be processed lawfully, fairly and transparently in relation to the data subject, with an appropriate legal basis to substantiate it, in accordance with fairness and good faith at all stages in ways that are easily accessible and understandable. This also applies to the processing of data between internal Zignago Vetro Group companies.

  The processing must, therefore, comply with the law; pursue a legitimate purpose; or be necessary to pursue a legitimate purpose. For example, processing may be required:

  - during a contractual relationship: in this situation, the counterparty's personal data may be processed to establish, perform and terminate a contract. Before a contract, personal data may be processed to prepare offers or purchase orders or to satisfy other requests from the potential counterparty relating to the conclusion of the contract. Potential counterparties may be contacted during the process of preparing the contract using the information provided. Any limitations requested by potential counterparties must be respected;
  - for advertising purposes: in this regard, where a data subject contacts a Zignago Vetro Group company with a request for information (e.g., a request to receive informational material regarding a product), personal data may processed to satisfy this request. Customer retention or advertising measures are subject to additional legal requirements, such as, for example, the obtaining of consent. Personal data may be processed for advertising, market research and opinion purposes, provided that this is consistent with the purpose for which the data were originally collected. The data subject must be informed of the use of their personal data for advertising purposes in advance. If personal data are collected for advertising purposes only, the data subject may choose whether to provide such data (optional provision).

- **Purpose limitation**

  The data is collected for specified, explicit and legitimate purposes, and subsequently processed in ways that are not incompatible with these purposes.

- **Data minimisation**

  Data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (principle of minimisation concerning the minimum amount of personal data and the minimum scope of personal data processing).

- **Accuracy**

  Personal data should be accurate and kept up to date. All reasonable steps must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.

- **Storage and disposal**

  Personal data must be stored for the time useful (and no longer) to achieving the aims for which they are processed. This period must be consistent with the information presented in the Privacy Policy Statement. Such data will be deleted when it is no longer necessary for the fulfilment of the related purposes, subject to further legal and contractual retention obligations.

  The Zignago Vetro undertakes to maintain and use adequate security mechanisms to protect personal data and prevent them from being stolen, abused and misused.

- **Processing Integrity and Security**

  Personal data must be protected from unauthorised circulation and processing, from illegal access or transfer, as well as from accidental loss, alteration or destruction.

  Before new data-processing methods are introduced, appropriate IT systems and technical and organisational measures to protect personal data must be designed and implemented. These measures must be based on the latest developments, the risks of the processing, and the need to protect the data and, in any case, should be suitable to ensure the confidentiality, integrity, and availability of the processing systems and that allow for the timely restoration of the availability and access of the personal data in the event of an incident.

  The technical and organisational measures relevant to protecting data must be documented by the data controller within the framework of assessing the impact on data protection and the record of processing activities.

5. Rights in relation to the processing of personal data

It is the right of the Data Subject, (under the circumstances and according to the conditions and, subject to the exceptions, established by applicable law) to:

- request access to the personal data processed by the Zignago Vetro Group: this right authorises the Data Subject to know whether or not personal data concerning him or her is being processed and, if so, also to obtain information thereon;
- request rectification of personal data: this right allows the Data Subject to have his/her personal data corrected where it is inaccurate or incomplete;
- request the deletion of personal data (right to be forgotten): this right authorises the Data Subject to request the deletion of his/her personal data, even where such data is no longer necessary to achieve the intended purposes;
- request restriction of personal data processing: this right authorises the Data Subject to request that the Zignago Vetro Group process his/her personal data only under certain circumstances, in addition to having his/her prior consent;
- request portability of personal data: this right allows the Data Subject to receive a copy (in a structured, commonly used, computer-readable format) of the personal data you have provided to the Zignago Vetro Group, or request the Zignago Vetro Group to send such personal data to another data controller;
- the Data Protection Officer ensures that such requests are processed and do not affect the rights relating to the personal data of other individuals;
- object, within the limits of the law, to the processing of his/her personal data: this right authorises the Data Subject to request that the Zignago Vetro Group no longer process his/her personal data;
- revoke consent to the processing of personal data at any time. This right will not affect Zignago Vetro Group's right to process the personal data received before the withdrawal of consent, or its right to continue partial processing under legal bases other than consent;
- The data subject has the right, exercisable at any time, to make a complaint directly to the relevant supervisory authority or to take legal action before a competent court.

6. Notice of data protection incidents

In the event of a potential breach of data security requirements (a "data protection incident"), the counterparties involved are required to investigate, give notice of and mitigate the damages.

A data protection incident is a personal data breach if there is a security breach that leads to the unlawful destruction, alteration, dissemination or use of personal data. Where a personal data breach is likely to entail a risk to the rights and freedoms of natural persons, the responsible supervisory authorities must generally be informed of the breach within 72 hours of when it is initially detected. In addition, data subjects must be informed of all personal data breaches that may pose a significant risk to their rights and freedoms.

If a personal data protection incident has been identified or suspected within the area of responsibility of one of the counterparties, all employees are required to report it immediately in accordance with the information security incident management process.

If the incident involves one of the companies of the Zignago Vetro Group, it will be the responsibility of the company that suffered the violation to notify the parent company Zignago Vetro as soon as possible.

7. Sources

Specifically, the ZV Group refers to the EU GDPR 679/2016 (Regulation (EC) No. 679/2016 of the European Parliament and of the Council of April 27, 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).

For Zignago Vetro, the legal references of this policy are Legislative Decree No. 196/2003, the "Consolidated Privacy Act", established in Legislative Decree 101/2018, and the provisions of Italy's Personal Data Protection Authority.

8. Governance

Within the Zignago Vetro Group, the responsibility for the implementation and communication of the principles contained in this Policy is assigned to the members of the Executive Committees of the Zignago Vetro Group companies, and thereafter to all the managers and heads of every company function.

9. Review

This Policy is subject to a review mechanism that provides for its updating on each occasion that there is a significant change in its contents and in any case at least every two years. Responsibility for its review lies with the Zignago Vetro Group's ESG Committee, consisting of some of the Zignago Vetro Group's most senior Executives, the majority of whom are members of the Internal Executive Committee, to ensure that all key corporate functions are represented in the management of ESG issues.