

PERSONAL DATA PROCESSING POLICY

This document describes the methods and purposes of processing of personal data by Stevanato Group S.p.a., as the controller (hereinafter also “**Stevanato**” or the “**Controller**”), and also provides any further information required by law, including information on the rights of the data subject and how to exercise them.

Regulation (EU) 2016/679 on personal data protection (hereinafter, the “**Regulations**”) lays down regulations on the protection of natural persons with regard to processing of personal data, and also on the free flow of said data, and protects the fundamental rights and freedoms of natural persons, particularly in relation to the right to protection of personal data.

According to Art. 4(1) of the Regulation , “**Personal Data**” means any information relating to an identified or identifiable natural person (hereinafter, “**Data Subject**”).

“**Processing**” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction (Art. 4(2) of the Regulation).

According to Arts. 12 et seq. of the Regulation, the Data Subject must also be provided with appropriate information on (i) the processing activities performed by the Controller (ii) the rights of Data Subjects.

1. PURPOSES OF PROCESSING AND LEGAL BASIS FOR PROCESSING

The Personal Data is provided directly by the Data Subject through compiling the contact form on the website www.stevanatogroup.com. The purposes of processing said data are:

- (i) to process communications sent by the Data Subject and purposes related to them, including the reply to said requests and the possibility of contacting the Data Subject with regard to them;
- (ii) sending promotional messages to the Data Subjects, via e-mail, on similar products to those already purchased and/or in relation to the sale of which the Data Subject has provided their Personal Data; the Data Subject is entitled to indicate that they do not wish to receive said messages;
- (iii) fulfilment of obligations laid down by laws, regulations or Union regulations, particularly relating to statutory, fiscal and accounting regulations, and also to implement the orders of legally recognised authorities or supervisory or control authorities.

Since processing of Personal Data, other than “sensitive” data, for the purposes indicated in points (i), (iii) above, is necessary, respectively, for fulfilment of a contract to which the Data Subject is a party, the performance of the required pre-contractual measures adopted on the Data Subject's request and to satisfy legal and contractual obligations, the Data Subject's

consent is not necessary. Processing of Personal Data for the purposes indicated in point (ii) is intended as permitted pursuant to decision no. 330 of the Personal Data Protection Authority dated 4 July 2013.

- (iv) for sending by the Controller of e-mails and promotional and marketing communications and for performance of market research, with the express prior consent of the Data Subject.

2. METHODS OF PROCESSING AND STORAGE

According to Art. 5 of the Regulation, the Personal Data shall be:

- (i) processed lawfully, fairly and in a transparent manner in relation to the Data Subject;
- (ii) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- (iii) adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- (iv) accurate and, where necessary, kept up to date;
- (v) processed in a manner that ensures appropriate security of the personal data;
- (vi) kept in a form which permits identification of the Data Subjects for no longer than is necessary for the purposes for which the personal data is processed.

The Personal Data will be processed by the Controller using automated and manual instruments; the Personal Data is stored in electronic format on secure servers located in areas with controlled access and with restricted accesses.

In order to prevent data loss, illicit, or incorrect use of data and unauthorised access, specific security measures are observed.

3. NATURE OF DATA COLLECTION. CONSEQUENCE OF FAILURE TO PROVIDE THE DATA.

- 3.1 Providing the Personal Data for the purposes of points (i) and (iii) of paragraph 1 is optional. However, if the data is not provided, the Controller will be unable to process the requests for information received from the Data Subject.
- 3.2 Providing the Personal Data for the purposes of point (ii) of paragraph 1 is essential to allow the Controller to send its communications on promotional initiatives on similar products to those already purchased and/or in relation to the sale of which the Data Subject has provided their Personal Data. The Controller will be unable to transmit said communications if the Data Subject refuses to allow this use.
- 3.3 Providing the Personal Data for the purposes of point (v) of paragraph 1 is optional and there will therefore be no consequences if the user refuses to provide their data.

4. STORAGE OF PERSONAL DATA

- 4.1 The Personal Data is stored for the period of time strictly necessary to achieve the purposes for which it has been collected and processed. With reference, in particular, to the purposes of points (i) and (iii) of paragraph 1, the Personal Data will be stored in order to proceed with Processing to fulfil requests for information from the Data Subject, including on the Controller's products and services. With reference to the purposes of point (ii) of paragraph 1, the Personal Data will be processed up until the Data Subject exercises the right to object

to processing or withdraws their consent to Processing. With reference to point (iv), the Personal Data will be processed for a maximum period of 24 months.

- 4.2 It is nonetheless agreed that, once the purposes of Processing have been achieved or, if the right to object to processing or to withdraw consent is exercised, the Controller will be authorised to store the Personal Data for a further period, in full or in part, for specific purposes, such as to invoke or defend a right before the courts (in the case of possible litigation concerning the activities performed by the Controller, for example).

5. COMMUNICATION OF PERSONAL DATA

The Personal Data will be accessible to the processors, and may also be communicated to external collaborators of the Controller and, when necessary to achieve the purposes of paragraph 1 of this policy document, to companies in the Controllers' group (including those located outside the European Union).

6. DISCLOSURE OF PERSONAL DATA

The Personal Data will not be disclosed.

7. TRANSFER OF THE PERSONAL DATA ABROAD

The Personal Data may be transferred to companies in the Controller's group located in countries of the European Union and also to third countries outside the European Union, for the purposes of paragraph 1. If the Personal Data is transferred outside the European Union, in the absence of an adequacy decision of the European Commission, the provisions of applicable regulations on transfer of Personal Data to third countries outside the EU will be satisfied. The Data Subject may ask the Controller, without formalities, at the address info.privacy@stevanatogroup.com, to provide a complete and up-to-date list of the companies located in the European Union and in the third countries to which the Personal Data may be transferred.

8. DATA SUBJECT'S RIGHTS.

At any moment, the Data Subject may access the Personal Data in order to correct it, erase it, exercise all the rights expressly granted by applicable Data Protection regulations and, in detail: the right to obtain confirmation of whether or not the Personal Data exists and its disclosure in intelligible form, to know the origin, purposes and methods of Processing; the right to obtain the identification details of the Controller, the processors and any parties or categories of parties to whom the Personal Data may be communicated; the right to check that the Personal Data is accurate or to ask for it to be supplemented or updated or corrected; the right to request erasure, conversion into anonymous form or blocking of Personal Data that is processed illegally, and also its restriction pursuant to law, and to object to Processing, in any case, in full or part, for legitimate reasons; the right to Personal Data portability, and also the right to lodge a complaint, notification or petition with the Personal Data Protection Authority, if the requirements for this are satisfied. The applicable regulations also grant Data Subjects the right to object to Processing of Personal Data for the purposes of point (ii) of paragraph 1 of this policy document, and also the right to withdraw their consent to Processing of the Personal Data at any moment, without prejudicing the legality of Processing performed by the Controller on the basis of consent provided before withdrawal.

9. THE CONTROLLER AND THE PROCESSOR

The Controller is Stevanato Group S.p.a., with registered office in Piombino Dese (PD), Via Molinella, 17.

10. COMMUNICATIONS AND EXERCISING OF THE DATA SUBJECT'S RIGHTS.

In order to exercise the rights of paragraph 8, the Data Subject may contact the Controller, at any moment, as follows:

- Address: Via Molinella, 17 35017 Piombino Dese (PD)
- Telephone number: 049 9318111
- Fax number: 049 9366151
- E-mail: info.privacy@stevanatogroup.com