PRIVACY NOTICE SUPPLIERS AND BUSINESS PARTNERS

This document describes the methods and purposes of processing of personal data of Suppliers and Business Partners by Stevanato Group S.p.a., as the Data Controller (hereinafter also "**Stevanato**" or the "**Compay**"), and constitutes "an information notice to the data subjects" under the terms of art. 13 of the GDPR.

EU Regulation 2016/679 on personal data protection (hereinafter referred to as the "**Regulation**") establishes a set of rules to be applied to personal-data processing and describes how natural persons must be protected. It likewise describes the rules on the free movement of such data and safeguards the rights and fundamental freedoms of natural persons, with particular reference to their rights to personal data protection.

Suppliers and **Business Partners**: natural o legal person (supplier, customer, partners) who have contractual or pre-contractual relationships with Stevanato Group Companies.

Data Subject: natural person, employees, workers, who act in the name and on behalf of Suppliers and Business Partners or interact with Stevanato group Companies for contractual, pre-contractual, negotiation execution activities (hereinafter "Activities").

On the other hand, "**Processing**" must be understood to mean any operation or set of operations which is performed on personal data or 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, point 2 of the Regulation).

1. PERSONAL DATA WHICH MAY PROCESS

The following categories of personal data (hereinafter "Personal Data") may be collected:

I. of Data Subject: data collected in relation to the Activities (e.g. mobile phone number, email address, other contact details), for Activities taking please via audio-video conference, may be collected audio and video; if an email account is assigned by Data Controller, data concerning log and activities according to the information security and cyber security may be collected

II. of Suppliers and Business Partners, if a natural person, data collected in relation to the Activities (e.g. mobile phone number, email address, bank data, other contact details), for Activities taking please via audio-video conference, may be collected audio and video; if an email account is assigned by Data Controller, data concerning log and activities according to the information security and cyber security may be collected

With regard to commercial and promotional communications sent by email, data relating to the receipt of and interaction with such communications may also be collected, including email opens, clicks on links and, to the extent permitted by the technology used, technical information associated with such interactions (such as IP address, device information, date and time of the interaction, and number of email opens)

2. PURPOSES OF DATA PROCESSING AND LEGAL BASIS

The purposes of data processing are:

(i) to process communications sent by the Data Subject and purposes related to them, including answering requests made by the Data Subject and contacting the Data Subject with regard to them;

(ii) to enable Stevanato to send contact details to the partners of the "EZ-guide" web platform (in whom interest was expressed when the special form was filled out) so that these partners can get in touch using common methods of communication.

(iii) to send promotional messages via email and common methods of communication to the Data Subjects about products, services and events similar to those already purchased and/or for which the Data Subject has provided his/her Personal Data; the Data Subject is entitled to indicate that he/she does not wish to receive said messages;

(iv) to fulfil 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, for the purposes outlined under points (i), (ii) and (iv) above, is necessary, respectively, for the fulfilment of a request made by the Data Subject, the performance of required pre-contractual measures adopted upon the Data

Subject's request and to satisfy legal and contractual obligations, the Data Subject's consent is not necessary. PersonalData handling for the purposes outlined under point (iii) shall be understood to be authorised on the grounds of the legitimate interest of the Data Controller For Stevanato to send communications about marketing initiatives and events launched by companies belonging to the Stevanato Group or aimed at promoting the products of companies belonging to the Stevanato Group, upon the express consent of the Data Subject in the newsletter-subscription form.

(v) sending promotional messages via email about products, services or events of the Stevanato Group which might, on the basis of the collected data, be of particular interest to the profiled user. I The legal basis for said processing is the legitimate interest of the Data Controller to make these communications or consent of Data Subject.

(vi) to measure the effectiveness of commercial communications, analyze recipients' interactions with the content sent and, where applicable, personalize subsequent communications based on the interests expressed (email communication tracking). the legal basis for this processing is the data subject's consent. consent to email communication tracking is optional and separate from consent to receive commercial and promotional communications. failure to provide consent, or the subsequent withdrawal of consent to tracking, does not prevent the data subject from receiving commercial and promotional communications, provided that the data subject has validly consented to receiving them.

3. METHODS OF PROCESSING AND STORAGE

Personal Data for handling must be:

(i) processed lawfully, fairly and in a transparent manner in relation to the data subject;

(ii) collected and filed 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 they are processed;

(iv) accurate and, where necessary, kept up to date;

(v) processed in a manner that ensures appropriate security standards;

(vi) kept in a form which allows the identification of Data Subjects for no longer than is necessary for the purposes for which the personal data are processed.

Personal Data shall be processed by the Data Controller using both automated and non-automated procedures and in an electronic and paper-based format; electronic storage of the Personal Data must take place on safe servers located in zones with controlled and restricted access.

The Company uses a wide range of security measures to improve protection and maintain the security, integrity and accessibility of your personal data

All Personal Data are stored on our secure servers (or on secure paper copies) or on those of suppliers or commercial partners, and may be accessed and used based on our standards and our security policies (or equivalent standards for our suppliers or commercial partners).

The security measures we have adopted include:

- restrictions on access to your personal data, based on necessity and solely for the purposes communicated;
- perimeter security systems to prevent unauthorized external access;
- permanent monitoring of access to IT systems to identify and stop the misuse of personal data;
- tracking of access to your personal data by internal personnel and verification of the related purpose;
- using encrypted means via TLS technology for transactions on our website that require the entering of personal data.

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4. NATURE OF DATA COLLECTION. CONSEQUENCES OF FAILURE TO PROVIDE DATA.

Providing the Personal Data for the purposes outlined under points (i), (ii) and (iv) of paragraph 1 is optional. However, if the data are not provided, the Controller will be unable to process the requests received from the Data Subject.

Providing your Personal Data for the purpose outlined under points (iii) of paragraph 1 is indispensable for the Data Controller to be able to send messages about promotional and marketing initiatives to the Data Subjects. Therefore, if Data Subjects refuse to grant their consent to receiving such messages, the Data Controller will be prevented from sending them.

Providing your Personal Data for the purposes outlined under point (v) of paragraph 1 is optional. Therefore, if you fail to provide your Data in this case, no particular consequences will be incurred.

5. HOW LONG WE STORE PERSONAL DATA

Personal data shall be stored for the time strictly necessary to achieve the purposes for which it was collected and Processed. With reference, in particular, to the purposes of points (i), (ii) and (iv) of paragraph 1, the Personal Data will be stored in order to proceed with Processing to fulfil requests from the Data Subject, including on the Controller's products and services, and to comply with obligations laid down by the law. Conversely, with reference to the purposes outlined under point (iii) and (vi) of paragraph 1, Personal Data will be processed until the Data Subject exercises his/her right to object to Processing. With reference to point (v), the Personal Data will be processed until the data subject has revoked his/her consent to Data Processing.

It must, however, be understood that once the purposes of the data handling have been achieved, or should the Data Subject exercise his/her right to object or withdraw his/her consent, the Data Controller will nevertheless be entitled to preserve the Personal Data, either wholly or in part, for certain purposes such as establishing a claim or defending a right before the courts (for instance, in the event of any disputes brought against the Data Controller's activities).

6. COMMUNICATION OF PERSONAL DATA

The Personal Data may be accessed by duly-authorized employees of the Company, by external suppliers appointed as data processors, who support us in providing services if necessary.

For the purposes of the performance of their activities and to follow up on the above mentioned purposes your personal data may also be accessed by other Stevanato Group companies

Where necessary for the pursuit of the aforementioned purposes, the Personal Data might be transferred abroad toward countries outside the EAA, which may be not considered adequate by the European Commission. In that case, the Company commits to ensuring an adequate level of protection by establishing appropriate guarantees in accordance with the GDPR. The full list of countries which are recognized by the European Commission as providing an adequate level of data protection according to EEA standard

In particular, the Company wish Data Subject to know that:

- for the purposes outlined under point (ii) of paragraph 1, the data may be transferred by Stevanato to partners of the “EZ-guide” web platform to other countries, including countries situated outside Europe.
- for the purposes outlined under point (vi) of paragraph 1, the data described herein may be transferred by Stevanato to HubSpot, Inc., whose principal place of business is in the United States and who will process the data in its capacity as Data Processor. HubSpot will process the personal data within the bounds established in the signed service arrangements and, in any case, in compliance with applicable legislation - indeed, the US company adheres to the EU-US Privacy Shield. For further details, please read HubSpot privacy policy.

In any case, the Data Subject may ask the Controller for further information (without the need for any formal procedures), by writing to the address info.privacy@stevanatogroup.com, and may ask for 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.

7. DISCLOSURE OF PERSONAL DATA

Personal data will not be disseminated.

8. DATA SUBJECT'S RIGHTS.

On the conditions provided by law, Data Subject is entitled to: require information on its Personal Data processing; require a copy of the personal data provided to the Company or to transfer it to a third party; require correction and/or completion if the Personal Data processed concerning Data Subject is incorrect or incomplete; require the erasure of the Personal Data; refuse to allow Personal Data to be processed for direct marketing purposes; revoke the consent, in cases where the processing is based on consent; limit the way in which we process Personal Data; exercise the right of objection. With specific reference to email tracking, the data subject may withdraw consent to such tracking at any time and by simple means, independently from the consent to receive commercial and promotional communications

The exercising of the above rights is subject to certain exceptions that are intended to safeguard the public interest (e.g. the prevention or identification of crimes) and our interests (e.g. maintaining professional secrecy).

You may contact the Controller and/or DPO at the addresses displayed above to make any requests regarding personal data processing by the Company, to exercise your legal rights and to obtain an updated list of the parties who have access to your data.

9. DATA CONTROLLER and DPO

This Privacy Policy applies to all companies within the Stevanato Group. The data controller of your data is the specific Stevanato Group company to which you are applying (the Company).

The Data Protection Officer ("DPO") can be contacted at the following address: info.privacy@stevanatogroup.com.

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