

## PERSONAL DATA 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.

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.

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

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).

Pursuant to articles 12 et seq. of the Regulation, the Data Subject must be provided with the right information about (i) the processing activities carried out by the data controller as well as (ii) the rights of Data Subjects.

### 1. PURPOSES OF DATA PROCESSING AND LEGAL BASIS

The Controller processes Personal Data (such as name, surname, telephone numbers, addresses, bank and payment details) disclosed by the Data Subject when this contract was entered into.

The purposes of Personal Data processing are:

- (i) carrying out those operations closely linked and necessary to set up contractual relations, including acquiring information prior to entering into the contract, as well in order to answer to the requests of informations by investors;
- (ii) meeting the requirements outlined in this contract, including managing relations with the data subject with regard to administration, payments, orders, deliveries, invoicing, services and dealing with any disputes;
- (iii) fulfilling obligations laid down by laws, regulations or Union legislation, particularly relating to statutory, fiscal and accounting matters, and also to implement the orders of legally recognised authorities or supervisory or control authorities, with regard to contractual relations between the Controller and the Data Subject;

Since processing Personal Data for the purposes outlined under aforementioned points (i), (ii) and (iii) is necessary to fulfil contractual and statutory obligations, the Data Subject's consent is not required.

### 2. METHODS OF DATA PROCESSING AND STORAGE

In compliance with the contents of article 5 of the Regulation, personal data must be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject;
- collected and filed for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;

- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date;
- processed in a manner that ensures appropriate security standards;
- 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 areas with controlled and restricted access.

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. CONSEQUENCES OF FAILURE TO PROVIDE DATA.**

Providing the Personal Data for the purposes outlined under points (i), (ii) and (iii) of paragraph 1 is optional. Nonetheless, failure to provide your data will prevent the Controller from setting up contractual relations and from complying with any duties entailed by this contract or closely connected to it;

### **4. PERSONAL DATA STORAGE.**

- 4.1 Personal data shall be stored for the time strictly necessary to achieve the purposes for which they were collected and processed. With particular reference to the purposes outlined under points (i), (ii) and (iii) of paragraph 1, Personal Data will be stored for the time required to carry out those activities strictly linked and necessary to setting up, managing and fulfilling contractual relations.
- 4.2 It must, however, be understood that once the purposes of the data processing 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 example, in the event of any disputes brought against the Data Controller's activities).

### **5. DISCLOSURE OF PERSONAL DATA.**

Data processors will be able to access your personal data and they may also be disclosed to the Controller's external collaborators as well as to companies belonging to the Controller's Group (including any companies located outside the European Union) should this be required to fulfil the purposes outlined under paragraph 1 of this privacy statement.

### **6. DISSEMINATION OF PERSONAL DATA.**

Personal data will not be disseminated.

### **7. TRANSFER OF PERSONAL DATA ABROAD.**

The Personal Data may be transferred to companies in the Controller's group located in countries of the European Union as well as to third parties outside Controller's group located in countries outside the European Union, appointed as Processors pursuant to art. 28 of GDPR, for the purposes of paragraph 1. In the case of

Personal Data being transferred outside the European Union, in the absence of an adequacy decision from the European Commission, the requirements specified in applicable legislation on Personal Data transfer to Countries outside the EU shall be complied with, by mean the subscription of Standard Contractual Clauses , pursuant to art. 46 comma 2 lett. c) of the GDPR. The Data Subject may ask the Controller (without the need for any formal procedures), by writing to the address [info.privacy@stevanatogroup.com](mailto: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. RIGHTS OF THE DATA SUBJECT.**

As a Data Subject, you must be allowed to access your Personal Data at any given time in order to correct or delete it, and to generally exercise all those rights to which you are expressly entitled under applicable laws on Personal Data protection. In detail, this includes the right to obtain confirmation of whether personal data are actually held or not and request that they be shown to you in an intelligible form, as well as the right to be given a description of the data and their source, intended purpose and methods adopted for processing; the right to obtain the identification details of the Controller and of the third parties or categories of third parties to whom data might be forwarded; the right to verify the accuracy of Personal Data or request that they be supplemented, updated or amended; the right to ask for Personal Data to be deleted, anonymised or blocked if they have been processed in breach of the law or restricted as provided by law, as well as the right to object in any case, on legitimate grounds, to the Data being processed; the right to portability of one's own Personal Data, as well as the right to submit a complaint, report or appeal to the Data Protection Supervisor, should there be grounds to do so.

## **9. DATA CONTROLLER.**

The Data Controller is Stevanato Group S.p.a., with registered offices in Piombino Dese (Padua, Italy), Via Molinella 17. (Email: [info.privacy@stevanatogroup.com](mailto:info.privacy@stevanatogroup.com)).

## **10. CORRESPONDENCE AND THE EXERCISING OF THE DATA SUBJECT'S RIGHTS.**

In order to exercise the rights envisaged under paragraph 8, the Data Subject may contact the Data Controller at any time by sending an email to the following address: [info.privacy@stevanatogroup.com](mailto:info.privacy@stevanatogroup.com).