

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 Personal Data are provided directly by the Data Subject by compiling the contact form on the website www.stevanatogroup.com or disclosed to Stevanato by email or other methods of communication (e.g. registering to take part in events organised by Stevanato, trade fairs, etc.). 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. Personal-data 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 to make such communications and pursuant to resolution n. 330 issued by the Data-Protection Supervisor on 4 July 2013.

- (v) 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.

Some personal data, amongst which browsing data (including information on how the website www.stevanatogroup.com is used) or those on emails which are opened or ignored, on the use of the system or other electronic systems by the user, interaction on social media or the forms that are filled in, may be collected and used by the Data Controller via the web-marketing and data-analysis services provided by HubSpot Inc. for:

- (vi) 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. Indeed, these activities profile and cluster the users who come into contact with the Data Controller and its web systems, so as to make Stevanato's commercial and promotional communications as efficient as possible. The legal basis for said processing is the legitimate interest of the Data Controller to make these communications. Stevanato has weighed up its own interests and those of the data subject (whose dealings with Stevanato can be defined as those of a professional working on the behalf of the Data Controller's customers or potential customers) and it deems that its own prevail and that these activities do not affect the interests, rights or fundamental freedoms of the data subject. In any case, this is without prejudice to the data subject's right to object to processing taking place, according to the methods described in more detail under point 10 of this privacy policy and to which we make reference.

2. METHODS OF PROCESSING AND STORAGE

In compliance with the contents of article 5 of the Regulation, 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.

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.

- 3.1 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.
- 3.2 Providing your Personal Data for the purposes outlined under points (iii) and (vi) 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.
- 3.3 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.

4. PERSONAL DATA STORAGE.

- 4.1 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.
- 4.2 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).

5. COMMUNICATION 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. DISCLOSURE OF PERSONAL DATA

Personal data will not be disseminated.

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 as well as to third countries outside the European Union, 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.

In particular, we wish you 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.

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) and (v) 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. DATA CONTROLLER

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

UK representative of the Controller

- Mail PO Box 10983
- M. +44 (0)7587062447
- E-mail: gdpr.uk_representative@stevanatogroup.com