



## ILPEA GROUP - Privacy Policy

### Introduction

This **Privacy Policy** sets out the principles which guide ILPEA GROUP (the “Company”) in protecting personal data.

### Privacy Principles

The Company implements safety and protective measures in accordance with the applicable laws concerning the receipt, handling and processing of personal data in the Company’s possession or its custody relating to its employees, job applicants, customers, suppliers or any other persons. All the Company’s activities involving personal data are consistent with the following principles:

#### Collection Limitation Principle

The collection of personal data is limited to the strict necessary to attain the set purposes and is only obtained through lawful and fair means and where appropriate, with the knowledge or consent of the concerned person.

Access to personal data and information is restricted to the Company’s directors, officers and employees, or third parties acting for, or on behalf of the Company, who need such information in order to do their job, or to provide services to the Company or its customers and whom have been properly trained.

#### Data Quality Principle

The personal data which are collected, are relevant and pertinent to the purpose(s) for which they are to be used, accurate, complete and up-to-date.

#### Purpose Specification Principle

The Company informs the concerned persons of the purpose(s) for which their personal data are collected and the subsequent use of the same will be limited to the fulfilment of such purpose(s) or such others, to the extent not incompatible with such purposes. Should such purpose(s) change or other purposes be added, this will be specified.

#### Limited use Principle

Personal data will not be disclosed, made available or otherwise used for other purposes than the specified purpose(s) without the consent of the concerned person or a general authorization of the Privacy Authority.

#### Security Principle

Personal data will be protected through adequate safety measures against the following risks: loss, unauthorized access, destruction, use, modification or disclosure of data.

## **Transparency Principle**

The Company deals in a transparent manner with the practices and policies regarding personal data processing and handling. The Company has the tools necessary to establish the existence and nature of the personal data, as well as to identify the main purpose(s) of the processing of the personal data.

## **Principle of the data subject's rights**

An individual has the right:

- a) to obtain from the Company confirmation whether or not the Company treats his/her personal data;
- b) to be informed about his/her personal data **(i)** within the term set by the national legislations; **(ii)** at a charge, if any, which is not excessive; **(iii)** in a reasonable manner, and **(iv)** in a form that is readily intelligible.

## **Accountability Principle**

The Company is accountable for implementation of the abovementioned principles.

The Company's web site on which this policy is published may contain links to other sites, such as, social networks and Google services. Industrie Ilpea S.p.A is not responsible for the contents, security, or privacy practices implemented by these other links / sites: the user itself will have to assess the privacy practices adopted by those web sites.

ILPEA reserves the right to modify or supplement this privacy policy from time to time without notice, so please check this privacy policy periodically.

Any concern, inquiry or request regarding this policy may be directed in writing to [info\\_privacy-it@ilpea.com](mailto:info_privacy-it@ilpea.com).