

PRIVACY AND COOKIE POLICY

This document has been prepared pursuant to the articles 13 and 14 of the EU Regulation 2016/679 (hereinafter the “**Regulation**” or “**GDPR**”) in order to inform the suppliers, how their personal information is processed with reference to the *Sofidel Sustainable Procurement Award*.

This document is intended for the *Sustainable-procurement.sofidel.com* platform and the *Sustainable Supply Chain Self-assessment Platform - "Tenp Paper"* questionnaire, integrated into the SAP Ariba platform (hereinafter the "**Platform**") but not also for other websites that may be consulted by the user through links in the Platform (for which reference is made to the respective information/privacy policy).

According to the Regulation, the processing carried out by Data Controller will be based on the principles of lawfulness, fairness, transparency, purpose and storage limitation, data minimisation, accuracy, integrity and confidentiality.

1. DATA CONTROLLER AND DATA PROTECTION OFFICER

The Data controller of processing carried out through the Platform is Sofidel S.p.A., having its address at Porcaro (LU), Via Giuseppe Lazzareschi, 23 (hereinafter “**Sofidel**” or “**Data Controller**”).

The Data Protection Officer (hereinafter the “**DPO**”) can be contacted:

- via email at the following: dpo.holding@sofidel.com.
- via postal mail at the above address.

2. PERSONAL DATA SUBJECT TO PROCESSING

We inform you that Data Controller will process your personal data, which may consist of an identifier such as your name, an identification number, an online identifier or one or more elements characteristic of your physical, economic, cultural or social identity that identify or can identify you (hereinafter just “**Personal Data**”).

The Personal Data processed through the Platform are the following:

a. Browsing data

The computer systems and software procedures used to operate the Platform acquire, during their normal operation, some Personal Data whose transmission is implicit in the Internet communication protocols. This information is not collected to be associated with identified data subjects, but by its very nature could, through

processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of computers used by users who connect to the Website, URIs (Uniform Resource Identifiers) of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc.) and other parameters regarding the user's operating system and IT environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the Platform and to check its correct functioning, to identify anomalies and/or abuses and are deleted immediately after processing. Data could be used to ascertain responsibility in the event of hypothetical computer crimes against the website or third parties.

b. Data voluntarily provided by the data subject

This document is intended for the processing of your personal data (as supplier, natural person and/or legal representative or contact person of the supplier of the Sofidel Group) for the purpose of performing the services through the Platform, with particular reference to:

- personal data you may have provided with reference to the Tenp Paper self-assessment questionnaire on the SAP Ariba platform, such as, by way of example, your personal and identification data (e.g. name, surname, tax code, date and place of birth, etc.), contact (e.g. email address, PEC address, mobile phone number, etc.), your professional qualification and your role in the company in which you operate. Access to and completion of the self-assessment questionnaire will allow you to participate electronically and through this Platform at the event "Sofidel Suppliers Sustainability Award (hereinafter also "3Saward") held by Sofidel S.p.A.
- with reference to the 3Saward application form, the Data Controller may process your personal information such as VAT number, company e-mail address, personal details, contact details (e.g., e-mail address and telephone number), professional qualification and the role in the company in which you operate. We inform you that the Data Controller may collect your personal data indicated above from independent third parties. Reference is made, for example, to your personal data, contact details, your professional qualification and/or your role, which may be communicated to Sofidel by the other companies of Sofidel Group. These companies are independent data controllers, to which you have provided your personal data within the scope of the existing supply contract, for the purpose of providing the services requested by you within this Platform. The access to the self-assessment questionnaire through the appropriate form on the Platform and the submission of your candidacy to the 3Saward, may involve communication of your personal information between Sofidel and the other companies of Sofidel Group to which you and/or your company are a supplier.

c. Cookies

Cookies are small text files that websites you visit send and record on your computer or mobile device, which are then resent to the same websites the next time you visit them. These cookies allow a website to remember your actions and preferences (such as, for example, your login details, your preferred language, font size, other display settings, etc.) so that they do not need to be indicated again when you return to that website or browse from one page to another. Cookies are used to perform computer authentication, session monitoring and storage of information regarding the activities of users who access a website and may also contain a unique identification code that enables the user's browsing within the website to be tracked for statistical or advertising purposes. While browsing a website, users may also receive on their computer cookies from websites or web servers other than the one they are visiting (so-called "third party" cookies). Some operations might not be performed without the use of cookies, which in some cases are therefore technically necessary for the website's operation.

There are various types of cookies, depending on their characteristics and functions, and they can remain on the user's computer for different periods of time. Session cookies are automatically deleted when the browser is closed, while persistent cookies remain on the user's device until a set deadline.

According to the laws in force in Italy, the use of cookies does not always require the express consent of the user. In particular, "technical cookies", i.e. those used exclusively with a view to carrying out the transmission of a communication on an electronic communications network or insofar as this is strictly necessary to provide a service explicitly requested by the user, do not require such consent. In other words, these cookies are essential to the functioning of the website or necessary for carrying out the activities requested by the user.

According to the Italian Data Protection Authority (see the Decision on Simplified Arrangements to Provide Information and Obtain Consent Regarding Cookies dated 8 May 2014 and subsequent clarifications, hereinafter "Decision"), technical cookies, which do not require express consent for their use, also include:

- analytics cookies" when used directly by the website operator to collect information, in aggregate form, on the number of users and how they visit the website,
- browsing or session cookies (to authenticate),
- function cookies, which allow the user to browse according to a series of selected criteria (for example, language, products selected for purchase) in order to improve the service provided to the user.
- On the other hand, "profiling cookies", i.e. those designed to create user profiles and used to send advertising messages in line with the preferences expressed by the user while browsing the web, require the prior consent of the user.

Types of cookies used by the Platform and the possibility of enabling or disabling them

The Platform uses the following cookies:

- Browsing or session technical cookies that are strictly necessary for the functioning of the Platform or that allow you to make use of the contents and services requested.

- Function cookies, which are used to activate specific features of the Website and a series of selected criteria (for example, language) in order to improve the service provided.

The cookies sent by Data Controller through the Platform are indicated below:

Cookie type and owner	Technical name of the cookies	Function and purpose	Persistence time	Cookie type and owner
Technical cookie	This cookie is essential for the Platform's operation	wires	Browsing session	Sofidel Spa
Function cookie	This cookie is essential for the Platform's operation	wire; wires_challenge	Browsing session	Sofidel Spa

3. PURPOSE OF PROCESSING

Your Personal Data will be processed for the following purposes:

- allow the interaction with the contents present on the Platform, including access to the self-assessment questionnaire and the application form for the 3SAward, as well as the provision of all other services made available by the Data Controller, including the management of the security of the Platform;
- management of your registration request for the 3SAward;
- comply with any legal, accounting or tax obligations;
- satisfy any defensive needs, possibly related to the detection, prevention, mitigation and detection of fraudulent or illegal activities in relation to the services provided on the Platform.

4. LEGAL BASIS AND MANDATORY OR OPTIONAL NATURE OF THE PROCESSING

The legal basis for the processing of Personal Data for the purposes referred to in section 3 a) and 3 b) is Art. 6(1)(b) of the Regulation: the processing is necessary for the provision of the services carried out through the Platform.

The provision of Personal Data for these purposes is optional; failure to do so would make it impossible to access the services requested and/or to register and participate in the event promoted by Sofidel S.p.A.

The purpose referred to in section 3.c represents a legitimate processing of Personal Data pursuant to Art. 6(1)(c) of the Regulation.

The purpose referred to in section 3.d represents a legitimate processing of Personal Data pursuant to Art. 6(1)(f) of the Regulation

5. RECIPIENTS OF PERSONAL DATA

Your Personal Data may be shared, for the purposes referred to in section 3 above, with:

- subjects who typically act as data controllers pursuant to Art. 28 of the Regulation; the list of data processors that process data can be requested from the Data Controller or the DPO by writing to the following addresses: gdpr.holding@sofidel.com; dpo.holding@sofidel.com.
- subjects, entities or authorities, autonomous data controllers, to whom it is compulsory to communicate your Personal Data pursuant to the provisions of law or orders by the authorities;
- persons authorised by Data Controller to process Personal Data pursuant to Art. 29 of the Regulation needed to carry out activities closely related to the provision of the Services, who have committed themselves to confidentiality or are under an appropriate legal obligation of confidentiality (e.g. Data Controller employees);
- other companies of Sofidel Group, as data controllers, as the communication may be necessary to comply with your request for access to the Tenp Paper self-assessment questionnaire through the Platform, the compilation of which is necessary for participation in the 3SAward.
- The data may be accessible to the other companies of the Sofidel Group for administrative-accounting purposes pursuant to Art. 6.1.f) and Recitals 47 and 48 of the Regulation.

6. TRANSFERS OF PERSONAL DATA

Your Personal Data may be shared with Recipients located outside the European Economic Area.

The Data Controller ensures that the processing of your Personal Data by these Recipients takes place in compliance with art. 44 - 49 of the Regulation. More information is available by sending a written request to the Data Controller at the addresses indicated above.

7. DATA RETENTION

Personal Data will be kept for the time strictly necessary to achieve those same purposes in accordance with the principles of storage minimisation and limitation pursuant to Art. 5.1.e) of the Regulation. In any case, the Data Controller will process the Personal Data for the time necessary to fulfil the contractual and legal obligations. Further information on the data retention period and the criteria used to determine this period can be obtained by writing to the Holder or to the DPO at the following address: dpo.holding@sofidel.com

8. DATA SUBJECTS RIGHTS

Pursuant to Art. 15 et seq. of the Regulation, you have the right at any time to request access to your Personal Data, its rectification or erasure, and to restrict its processing in the cases provided for under Art. 18 of the Regulation, to receive the personal data concerning you in a structured, commonly used and machine-readable format in the cases provided for by Art. 20 of the Regulation. At any time, you may revoke your consent pursuant to Art. 7 of the Regulation; lodge a complaint with the competent supervisory authority pursuant to Art. 77 of the GDPR (Data Protection Authority) pursuant to Art. 77 of the Regulation, if you believe that the processing of your data infringes the legislation in force.

You can object to the processing of your data under Art. 21 of the GDPR in which you give evidence of the reasons for your objection: the Controller reserves the right to evaluate the request, which will not be accepted if there are legitimate grounds for the processing which override your interests, rights and freedoms.

Requests should be sent in writing to the Controller or to the DPO at the following email addresses: gdpr.holding@sofidel.com, dpo.holding@sofidel.com

9. CHANGES

Data Controller reserves the right to modify or simply update the content of this document, in part or in full, also as a result of changes in the applicable legislation. Data Controller will inform you of such changes as soon as they are introduced and they will be binding as soon as they are published on the Website. Data Controller therefore invites you to visit this section regularly to stay informed about the latest and most updated version of the privacy policy so as to be always up to date with the data collected and the use that Data Controller makes of it.