

**★ REGULATION (EU) 2016/679 OF THE EUROPEAN
PARLIAMENT AND OF THE COUNCIL OF 27 APRIL 2016 ON
THE PROTECTION OF NATURAL PERSONS (GENERAL
DATA PROTECTION REGULATION)**

**POLICY
DATA CONTROLLER**

**Controller processing the
personal data**

JSW Steel Italy Piombino S.p.A

For any information please
contact:

privacy@gsilucchini.com

-Data Protection Officer

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Controller and processor of personal data

GSI Lucchini S.p.a., Headquarters In Piombino (LI), Largo Caduti sul lavoro No, 21, 57025, Piombino, TAX CODE 01189370495 (as, "GSI" or the "Controller"), as the Controller of the personal data, shall be process the personal data in accordance with as set out in this Regulation UE 2016/679 (GDPR) and followings.

In accordance with the Regulation UE 2016/679 (GDPR), The Controller of personal data European law concerning to the processing of personal data intends to specifying as follows:

- the meaning of definitions used by this Regulation (art.4);
- reaffirm the principles set in the processing of personal data (art.5 e 6)
- to identify the Referents or the Processors of personal data;
- to clarify the rights of the processing of data subject (artt.12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22)

Significant extracts art.4 GDPR 2016/679

'personal data' means any information relating to an identified or identifiable natural person ('**data subject**');

'processing' means any operation or set of operations which is performed on personal data or on 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;

'profiling' means any form of automated processing of personal datato evaluate certain personal.... concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

'filing system' means any structured set of personal data which are accessible according to specific criteria;

'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;

'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

'consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

'personal data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;

'data concerning health' means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his or her health status;

Significant extracts art.5 e 6 GDPR 2016/679 relating to Principles set out in processing of personal

'lawfulness, fairness and transparency';

'purpose limitation' (*must be collected for specified, explicit and legitimate purposes*);

'data minimisation'; (*adequate, relevant and limited*);

accuracy of the personal data;

'storage limitation'; (*kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed*);

'integrity and confidentiality'

Lawfulness of processing , where, *Alternatively* (art.6):

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested as the controller;
- f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Significant extracts artt.12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22 GDPR 2016/679 concerning the rights of data subject

« ... The controller shall take appropriate measures to provide any information referred to in Articles 13 and 14 and any communication under Articles 15 to 22 and 34... »

« ... The controller shall facilitate the exercise of data subject rights ... »

« ... The controller shall provide information on action taken on a request under Articles 15 to 22 to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months ... »

« ... If the controller does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy ... »

« ... Where personal data have not been obtained from the data subject, the controller shall provide the data subject with the following information: ... the identity and the contact details of the controller ... the contact details of the data protection officer, where applicable ... the purposes of the processing ... the categories of personal data concerned ... the recipients or categories of recipients of the personal data... that the controller intends to transfer personal data to a recipient in a third country or international organisation ... the period for which the personal data will be stored... where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the controller ... the access to... (*shall inform ...about the right to have*)... rectification or erasure of personal data..... portability..... »

« ... A data subject should have the right to have access to information related to the purposes ... the categories of personal data ... the categories of recipients to whom the personal data have been or will be disclosedthe period of their storage ... the right to have personal data concerning him or her rectified ... the right to lodge a complaint ... the existence of the processing operation ... »

« ... A data subject should have the right to erasure of personal data ... without undue delay ... where ... not necessary for the purposes of the processing ... In the case of the data subject withdraws consent ... »

« ... The data subject shall have the right to obtain from the controller restriction of processing ...where the accuracy of the personal data is contested ... the processing is unlawful ... »

« ... The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format ... »

« ... The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions ... »

« ... Where personal data are processed for direct marketing purposes ... ».

The main items for the knowledge concerning the to the data processing operations are summarised below:

- the Types and Purpose of data for which it is necessary to collect

The Data collected by the controller of the processing

All Data relating the activity of steel company:

- the direct and indirect exercise of any industry involved in the production, processing and manufacture of ferrous and non-ferrous materials, even on a contract work basis, as well as complementary, accessory, auxiliary and similar industries;
- the assumption and running of any activity in which its products and by-products find their use or which concerns raw materials or materials necessary for its manufacture;
- trade in a general sense of all products of the aforementioned industries and their derivatives, even if manufactured by third parties;
- the company may assume stakes and interests in other companies and may carry out all the capital, real estate, industrial, commercial and financial transactions which will be considered advantageous for the achievement of corporate purposes;
- the Company may also assume stakes and interests in other companies or companies with similar, analogous, complementary or any other purpose in any case related to its own. After resolution of the assembly of Shareholders, the company will be able to guarantee the debts and obligations of companies in which it holds an investment directly or indirectly and of third parties, through trusts, guarantees, pledges, mortgages or privileges.

Our Company processes personal data of third parties always taking every necessary measure to ensure the confidentiality and security of the data processed.

The processing of Personal Data is carried out with the help of instruments is carried out mainly with the aid of electronic or otherwise automated instruments, and, in the alternative, with manual means, in the manner and by appropriate means to ensure the security and confidentiality of the data, in accordance with the provisions of the GDPR. The data is protected by storing and collecting them in closed containers and/or rooms with exclusive access to the data processor. Their manipulation and/or exposure of the Data takes place only during the execution of the Processing.

The Data Controller, well aware of the importance of implementing the GDPR requirements and to ensure compliance, has identified and nominated the specific contact persons (Referenti) for the processing, for the different processing of Personal Data carried out within the internal organizational structure.

These contact persons (Referenti) have been previously instructed and adequately trained to perform all activities necessary for the protection of personal data referred to in the above mentioned legislation.

The contact persons have subsequently subscribed to specific policies in which they undertake to follow all procedures to protect personal data in accordance with the GDPR.

In addition, according to GDPR art.30, the Data Controller has set up an electronic register of processing activities.

This register, to which reference is made for the specific analysis of the organisational structure for the processing of personal data, will be updated whenever required by the aforementioned legislation and in case of changes to the organisation.

Personal Data will be processed within the European Union and stored on servers located within the European Union. The same data may be processed in countries outside the European Union, provided that an adequate level of protection is guaranteed, recognised by the appropriate decision of the European Commission.

Any transfer of Personal Data to non-EU countries, in the absence of an adequacy decision by the European Commission, adequate guarantees of a contractual or contractual nature will only be possible if appropriate guarantees are provided by the Owners and Managers involved, including binding corporate standards ("binding corporate rules") and standard contractual data protection clauses.

A transfer of personal data to and from countries outside the Union, In the absence of an adequacy decision, or and other suitable measures as described above, will be process only where to in mancanza di una decisione di adeguatezza o di altre misure adeguate come sopra descritte, will be performed only if you have explicitly consented or in the cases provided for by the GDPR and will be processed in the interests of the subject.

In carrying out its activities and for the pursuit of the Purposes, the Personal Data may be disclosed to public and/or private organizations and other persons authorized to receive them by law.

Personal Data can be held either in paper form (by post and/or courier service) or in electronic form (e-mail, PEC, online platforms).

The Personal Data will be processed by the Controller through his own staff or collaborators duly authorized to this, only to the extent necessary and on the basis of specific instructions of the Owner, with guarantee of confidentiality and confidentiality.

The Personal Data assigned will be be taken in accordance with the principle of proportionality, until the purposes of the processing are pursued and in any case for a period not exceeding 10 years, and will not in any case be communicated to third parties, except in compliance with legal or settlement obligations. In any case it shall be subject to the following provisions.

In the event of a complaint to the Garante per la Protezione dei Dati Personali (Data Protection Supervisor), you may lodge a complaint through::

a) recommended A/R addressed to Garante per la Protezione dei Dati Personali, Piazza di Monte Citorio, 121 00186 Roma;

b) e-mail addressed to: garante@gdp.it, oppure protocollo@pec.gdp.it;

c) fax to number: 06/69677.3785.