

Global Personal Data Protection Policy

Pirelli is aware of the importance of ensuring adequate safeguards to stakeholders of the processing of personal data that each of the companies belonging to the group performs in the course of its business activities.

With this Policy, Pirelli intends to provide to directors, employees and all those who represent the company to third parties, information regarding the basic principles of conduct to be followed as part of the processing carried out.

The processing of personal data shall comply in particular with the following principles and general rules:

- **lawfulness**: processing operations shall be based on a valid basis of legitimacy, be carried out for lawful purposes and comply with applicable laws and principles of fairness;
- **exactness of purposes**: personal data shall be collected and recorded for the pursuit of legitimate processing purposes which have been identified in advance and communicated to the parties concerned;
- **necessity and proportionality**: processing operations shall be performed only when necessary to achieve the purposes and shall only concern personal information that is relevant, complete, promptly updated and not excessive in relation to what is necessary for the pursuit of legitimate processing purposes. If the processing of personal data is not necessary for the pursuit of the purposes, the data shall be made anonymous;
- **reasonable duration**: personal data shall be processed for a period of time not exceeding that required to achieve the purposes, after which it shall be destroyed or made anonymous, except when necessary for retention, if required by applicable law;
- **disclosure and consent**: data collection shall be preceded by an appropriate written disclosure, if required by applicable law. For the processing of certain types of data or for certain purposes, the prior written consent of the parties concerned is required, subject to certain exceptions provided for by local regulations;
- **access rights of the parties concerned**: parties concerned shall always have the right, to the extent required by applicable law, to have confirmation of the existence of personal data concerning them, to know any personal data relating to them that is processed by Pirelli and the origin of the same, to be informed about parties or categories of parties to which the data may be communicated, to request the updating, correction or integration, and if the conditions apply, cancellation of the data, and to oppose for legitimate reasons the performance of certain processing operations and, in any case, to those carried out for marketing purposes.
- **security**: in order to ensure the protection of personal data, aimed at preventing the risk of loss, destruction or unauthorised access, the most appropriate security measures shall be adopted, in accordance with applicable laws and company policies.

The principles and rules contained in this policy are outlined in a “Privacy Compliance Manual”, adapted to each local situation.