

PRIVACY POLICY pursuant to EU Regulation n. 679/2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “EU Regulation”).

This privacy policy sets out how Tenova S.p.A. (“**Tenova**” or the “**Company**”), as Data Controller, processes and protects any personal information that you provide to Tenova in compliance with the EU Regulation, Privacy Code and all the applicable regulation in force. The processing of personal data is based on principles of correctness and lawfulness; Tenova policy grants the protection, confidentiality and security of information collected from any third parties.

1. SOURCE OF PERSONAL DATA

Personal data will be collected directly from the data subject.

All personal data are processed in compliance with the aforementioned regulations, assessing all the risks involved and respecting the obligations of confidentiality that have always been inspired by the activity of the Company.

2. PURPOSE OF PROCESSING

The processing of personal data (as defined in EU Regulation) will be carried out for the purposes indicated below:

- a) management of whistleblowing reports and consequent investigations and actions;
- b) archiving purposes.

3. LAWFULNESS OF PROCESSING

The above mentioned purposes will be pursued according to the provisions of art. 6, letter a), b), c) or f) of the EU Regulation, depending on the content of the whistleblowing report.

4. MEANS FOR PROCESSING

In relation to the aforementioned purposes, the processing of personal data takes place through manual, computerized and telematics tools with logic strictly related to the purposes themselves and, in any case, in order to guarantee the security and confidentiality of the data.

Your personal data will be stored for a period of time not exceeding what is necessary to achieve the purposes for which they have been collected and, in any case, unless erasure requests by the data subject.

5. COMMUNICATION OF DATA

Your personal data may also be processed by companies of the Tenova and the Techint Group or by third parties with whom Tenova maintains contractual relationships linked to the pursuit of the above mentioned purposes, who act as Data Processors.

The company may also transfer your personal data, always within the aforementioned processing purposes, to subjects located in countries not included in the European Union, which however must have ensured adequate compliance with the guarantees provided by the Regulations.

6. RIGHTS OF DATA SUBJECTS

At any time, you can know how your data were acquired, check whether they are accurate, complete, updated and well kept, as well as assert your rights under Articles 15 and subsequent of EU Regulation 2016/679 (right of access, right of rectification or erasure of data, right to restriction of processing, right to data portability, right to object), by writing to privacy@tenova.com.

If you believe that there has been a breach of the law in the processing of your personal data, you may lodge a complaint to the Italian Data Protection Authority (“*Garante per la Protezione dei Dati Personali*”) or appeal to the competent judicial authority.

7. DATA CONTROLLER AND DATA PROTECTION OFFICER (DPO)

Data controller is Tenova, in the person of its Legal Representative *pro-tempore*, to which the data subject may contact to obtain any further information connected with this policy and possibly exercise the rights that the law recognizes him also by email at privacy@tenova.com.

Pursuant to Articles 37 and following of the EU Regulation, Tenova has appointed Mr. Donato La Muscatella as external Data Protection Officer, who may be contacted by data subjects, for all matters relating to the processing of their personal data and to exercise their rights in this matter by email at dpo@tenova.com.

