

ZVG DATA PRIVACY POLICY

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Review	Approval Date by ESG Committee	Changes made
0	02/03/2021	First edition
1	13/10/2021	Added Governance and Review sections

1. ZIGNAGO VETRO GROUP - INTRODUCTION

The Zignago Vetro Group (hereinafter also ZVG or the Group), with registered office in Fossalta di Portogruaro, is an Italian and European leader in the production and sale of glass containers.

ZVG is part of an industrial group led by Zignago Holding, a company that operates not only in the glass industry, but also in other sectors, including wine-making and the production of electricity from renewable sources. In addition to Italy, the Zignago Vetro Group is present in France, Poland and the USA.

In order to integrate the principles of sustainability into its Business Model, ZVG has decided to create an **ESG framework**. The ESG Policy and the Ethics Code form the cornerstones of this framework, and are designed to promote the principles of legality, fairness, equality and transparency, in addition to those of sustainability. By establishing consistent policies, the framework also seeks to govern relationships with key stakeholders in order to share and spread these principles, both within the company and externally.

The Group views protecting personal data as a fundamental value which should be central to the day-to-day activities of all Group companies. The Group adopts a **personal data protection policy** to promote the protection of personal data and safeguard the rights of the data subjects through procedures, policies and information and awareness-raising campaigns regarding data protection.

2. OBJECTIVE, REFERENCE DOCUMENTS AND ADDRESSEES

The objective of this personal data protection policy, which applies to the data of its employees, customers and other users, is to lay down the basic principles according to which such data are processed and to identify the responsibilities of its departments and employees during personal data processing.

ZVG is committed to complying with applicable personal data protection laws and regulations in the countries in which it operates.

Specifically, ZVG refers to the EU GDPR 679/2016 (Regulation (EC) No. 679/2016 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC).

For Zignago Vetro, the legal references of this policy are Legislative Decree No. 196/2003, the "*Consolidated Privacy Act*" and the provisions of Italy's Personal Data Protection Authority.

This policy covers all data subjects who use the Company's products.

3. SCOPE OF APPLICATION

This Policy applies to all Group companies, and specifically: *Zignago Vetro SpA*, *Zignago Vetro Brosse SaS*, *Zignago Vetro Polska SA* and *Zignago Glass Usa Inc*.

Each of the above companies shall operate in accordance with this Policy, without prejudice to the fact that compliance with the national law in force in the country in which the Company operates and European law, where applicable, shall prevail.

Personal data must be processed lawfully and in good faith.

Data may be processed only if, and to the extent that, there is a sufficient legal basis for processing activity. This also applies to the processing of data between internal Group companies.

Personal data processing is lawful if one of the circumstances for authorisation pursuant to the rules set out in section 4 applies.

4. GENERAL PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

The principles applicable to data protection lay down the organisation's responsibilities in managing personal data.

By laying down the following principles, the company undertakes to abide by Article 5(2) GDPR, which states that *"The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1"*.

4.1 Lawfulness, correctness and transparency

Personal data must be processed in a manner that is lawful, correct and transparent towards the data subject.

4.2 Accuracy

Personal data must be accurate and up to date and must adopt all measures required to achieve this aim.

4.3 Storage and disposal

Personal data must be stored for the time useful (and no longer) to achieving the aims for which they are processed. This period must be consistent with the information presented in the Privacy Policy Statement.

Zignago Vetro undertakes to maintain and use adequate security mechanisms to protect personal data and prevent them from being stolen, abused and misused.

4.4 Security of processing

Personal data must be protected from unauthorised access and from illegal processing or transfer, as well as from accidental loss, alteration or destruction.

Before new data-processing methods are introduced, appropriate IT systems and technical and organisational measures to protect personal data must be designed and implemented. These measures must be based on the state of the art, the risks of processing and data protection needs.

The technical and organisational measures relevant to protecting data must be documented by the data controller within the framework of assessing the impact on data protection and the record of processing activities.

4.5 Data portability

Data subjects have the right to receive a copy of their data provided by express request.

The data subject may also request that their data be transferred to another controller.

The Data Protection Officer shall be responsible for ensuring that such requests are processed and do not affect the rights relating to the personal data of other individuals.

4.6 Data processing during a contractual relationship

The counterparty's personal data may be processed to establish, perform and terminate a contract. Before a contract, personal data may be processed to prepare offers or purchase orders or to satisfy other requests from the potential counterparty relating to the conclusion of the contract. Potential counterparties may be contacted during the process of preparing the contract using the information provided. Any limitations requested by potential counterparties must be respected.

4.7 Data processing for advertising purposes

If a data subject contacts a Group company with a request for information (e.g., a request to receive informational material regarding a product), personal data may be processed to satisfy this request. Customer

retention or advertising measures are subject to additional legal requirements. Personal data may be processed for advertising, market research and opinion purposes, provided that this is consistent with the purpose for which the data were originally collected. The data subject must be informed of the use of their personal data for advertising purposes in advance. If personal data are collected for advertising purposes only, the data subject may choose whether to provide such data.

4.8 Right to erasure

Data subjects may request that their personal data be erased.

5. NOTICE OF DATA PROTECTION INCIDENTS

In the event of a potential breach of data security requirements (a “data protection incident”), the counterparties involved are required to investigate, give notice of and mitigate the damages.

A data protection incident is a personal data breach if there is a security breach that leads to the unlawful destruction, alteration, dissemination or use of personal data. Where a personal data breach is likely to entail a risk to the rights and freedoms of natural persons, the responsible supervisory authorities must generally be informed of the breach within 72 hours of when it is initially detected. In addition, data subjects must be informed of all personal data breaches that may pose a significant risk to their rights and freedoms.

If a personal data protection incident has been identified or suspected within the area of responsibility of one of the counterparties, all employees are required to report it immediately in accordance with the information security incident management process.

6. GOVERNANCE

Within the Zignago Vetro Group, the responsibility for the implementation and communication of the principles contained in this Policy is assigned to the members of the Executive Committees of the Group companies, and thereafter to all the managers and heads of every company function.

7. REVIEW

This Policy is subject to a review mechanism that provides for its updating on each occasion that there is a significant change in its contents and in any case at least every two years. Responsibility for its review lies with the Zignago Vetro Group’s ESG Committee, consisting of some of the Group's most senior Executives, the majority of whom are members of the Internal Executive Committee, to ensure that all key corporate functions are represented in the management of ESG issues.

Fossalta di Portogruaro, October 13, 2021