

# PRIVACY PROTECTION POLICY

The Hera Group intends to pursue a multi-business growth strategy that integrates personal data protection, based on the principles of lawfulness, fairness, transparency, purpose and storage limitation, data minimisation, accuracy, integrity and confidentiality.

This policy, in line with the Group's mission, its values and its strategy, defines a series of principles to be adopted and translated into balanced goals, constantly respecting norms in information protection and security, in particular personal data, monitored and periodically re-examined to remain coherent with the Group and its context.

The Hera Group is committed to:

- ✓ Respecting the identity, personality and dignity of every human being, as well as the personal sphere and private life of each individual;
- ✓ Protecting the personal data of each individual;
- ✓ Respecting basic liberties regarding privacy, using means including guarantees of compliance with legislation;
- ✓ Reducing the use of personal data to the minimum amount necessary to reach the stated goals;
- ✓ Limiting personal data processing to cover only data linked to specific, explicit and legitimate aims, with modalities, tools and limits for storage that are calibrated to match the aims to be reached;
- ✓ Providing concerned parties with information and communications that are up to date, easily accessible and comprehensible as regards the processing of their personal data;
- ✓ Guaranteeing the fairness and reliability of the data processed, through verifications and updates;
- ✓ Guaranteeing the rights of concerned parties, as foreseen in the area of privacy;
- ✓ Respecting norms in the area of personal data processing.

## TARGETS PURSUED

### Continual improvement in personal data protection by:

- Adopting an adequate and updated database system, integrated within the Group's system (guidelines, procedures, operating instructions, standard document formats);
- Identifying and evaluating all aspects linked to the risks arising from personal data processing already in the phase of definition/planning/revision of corporate processes (privacy by design and privacy by default);
- Defining an organisational model suited to processing the personal data involved in every business process and operations;
- Identifying the corporate roles provided with the requisites and powers required to guarantee the correct operation of the privacy management system;
- Adopting security measures able to prevent and drastically reduce the risks inherent in personal data processing;
- Adopting the best and most economically sustainable technologies available for containing damage in the event of incidents or negative events in the area of personal data processing, and for data restoring methods in the event of damage or incidental loss.

### Stakeholder involvement and personal data protection with interventions aimed at:

- Increasing awareness among employees, suppliers, customers, shareholders and citizens as regards the goals, targets and commitments made in the area of personal data protection;
- Motivating staff and involving them in reaching the goals set, and developing, at all levels, a sense of responsibility towards personal data protection and information safety;
- Providing training and information for a lawful and correct personal data processing and information security;
- Promoting dialogue and discussion among all parties concerned (public administration, authorities, citizens, associations, customers, workers etc.), taking into account their requirements in the area of personal data processing, in line with the participation and communication tools adopted by the Group.

The Hera S.p.A. Board of Directors, acting as Parent Company, recognises, as a strategic choice, the development of a management system for personal data protection, integrated and shared across Group companies.

Those charged with Group company processing are engaged in respecting and implementing the commitments contained in the aforementioned Policy, ensuring and periodically verifying that the Policy is documented, re-examined and made operational, available to all personnel and transparent to all stakeholders.

Bologna, 30/7/2018

The Executive Chairman  
Tomaso Tommasi di Vignano



The CEO  
Stefano Venier

