

POLICY ON PERSONAL DATA PROTECTION.

PrivacyManagementSystem
PersonalDataProtectionPolicy

NoidiPoste



Poste Italiane Group considers **personal data protection** a fundamental value by which every company of the Group must be inspired when carrying out its daily activities.

The Group protects and promotes the safeguarding **of the personal data and rights of Data Subjects**, through **policies and campaigns designed to provide information and raise awareness about data protection**.

The Group implements all the **adequate measures** necessary to ensure a high level of **protection of the personal data of the Data Subjects**, including customers, employees, and suppliers, favouring the development of a **culture of confidentiality**.

The development and implementation of the actions designed to protect personal data are based on the following guiding principles:

- the lawfulness, fairness, and transparency of the processing;
- “data minimisation”, ensuring that the processing is limited only to the data necessary for the purposes to be pursued;
- retention of the personal data for a period of time not exceeding that required to pursue the above-mentioned purposes;
- monitoring and assessment of the impact of the processing for data protection purposes;
- application of adequate technical and organisational measures to guarantee the security of the personal data.

The appropriate personal data protection strategy is pursued by implementing, correctly using and maintaining a privacy management system compliant with the requisites of EU Regulation 2016/679 (General Data Protection Regulation - GDPR).

The company, therefore, undertakes to use this system - based on the principle of **continuous improvement** – bearing in mind its own specific organisational and production scenarios.

The main actions through which the personal data protection policy is implemented are:

- the prompt adjustments made to bring the company into line with all the changes and updates to the standards;
- the guarantee that the innovations and transformations of the processes used to provide services are always accompanied by personal data protection objectives;
- effective and **transparent information** that ensures the Data Subjects are notified of all useful information, including the instructions and measures of the collaboration of Data Supervisor companies;
- the identification of **roles and responsibilities** within the organisation and the planning and execution of the plans designed to accomplish the objectives of continuous improvement. That is, with a particular focus on safeguarding the rights of Data Subjects;
- the performance of the assessment of the impact on personal data protection, when processing presents a high risk to people's rights and freedom;
- the **prohibition of transferring** personal data to countries located outside the European Union, when adequate guarantees are lacking;

- **training and information** the staff of Poste Italiane, favouring the development of their sense of responsibility and the awareness of the whole organisation about protecting the confidentiality of individual Data Subjects' personal data;
- the periodic **management review** performed to evaluate the fairness and effectiveness of the management system from a perspective of continuous improvement.

This policy is communicated to all employees and has also been made available to all collaborators and suppliers, in a bid to ensure full awareness of the issues covered and further encourage the recipients to promote the management of personal data protection as an integral part of the system of values of Poste Italiane Group.

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Chief Executive Officer and Director General

Matteo Del Fante
(signed original)

