

		Data Protection Policy			
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DATA PROTECTION POLICY

TEMPLATE COMPLIANT WITH GDPR





Data protection policy

A.C.S.A. Steel Forgings SpA in the context of its activities collects and manages all personal data related with data subjects in accordance with national and European data protection regulations. A.C.S.A. Steel Forgings SpA uses the data of the interested parties for purposes of its services and products delivered on the territory of the European Union. A.C.S.A. Steel Forgings SpA is active in closed die hot steel forgings industry. Our products are used in any possible industry sector, such as automotive (transmission and engine parts for cars, commercial vehicles and motorcycles) , aeronautical, petrochemical, earth movement, agricultural, machinery, and so forth.

Applicability

Recipients subjects of this policy are all actors involved in data processing. In particular, the following categories are strongly advised to submit this policy:

- a) Internal staff of A.C.S.A. Steel Forgings SpA
- b) Thirds parties that have a role of suppliers of goods and services
- c) Data subjects
- d) Public authority
- e) Category associations

National and international regulation

A.C.S.A. Steel Forgings SpA as a company having its registered office in a Member State of the European Union is subject to the following regulation.

- EU regulation 2016/679
- D.l.gs 196/2003 (privacy code)

Definitions

- **Data subjects:** Any physical person interested in data processing
- **Data controller:** Legal entity or physical person determining the modalities, purposes and limitations of data processing.
- **Data processor:** Legal entity or physical person who is appointed by formal contract to carry out treatment activities by name and title.
- **Data protection officer:** Control body for compliance with the data protection regulation within the company and contact point for the guarantor authority
- **Personal Data:** Any information that could be used to identify a physical person or that could be directly or indirectly linked to the physical person.



- **Consent:** Authorization granted by the interested party to the treatment after being duly informed
- **A security incident involving personal data:** Any incident involving a loss of availability, integrity or confidentiality of the personal data of the parties concerned.

Roles and responsibility

A.C.S.A. Steel Forgings SpA , in order to ensure the protection of the personal data of the persons concerned, it has adopted an internal scheme designed to define its roles and responsibilities.

Data controller

Data controller is A.C.S.A. Steel Forgings SpA

Internal data processor

The internal data processor is Arturo Colombo

Consent and choice

This section contains the internal A.C.S.A. Steel Forgings SpA standard for managing and collecting consent to treatment.

Consent to treatment

A.C.S.A. Steel Forgings SpA undertakes to provide the data subject with the information in the most comprehensive, exhaustive and practicable way possible. A.C.S.A. Steel Forgings SpA is committed, in the case of oral consent, to provide a copy of the notice to the email contact provided by the interested party.

Any data subjects can at any time, in accordance with the provisions of the current legislation, revoke the consent to treatment. In order to comply with this purpose A.C.S.A. Steel Forgings SpA has prepared the following methods: specific link on the company website www.acsa.it or email contact dedicated to the request for revocation of consent.

All employees and third parties acting on behalf of A.C.S.A. Steel Forgings SpA must therefore:

- Verify wherever possible the identity of the interested person.
- Request parent's consent if the interested person is less than 16 years of age.
- Provide the information prepared by the company before starting any data treatment activities.
- Collect and record the consent obtained in verbal form.
- Inform those interested about the treatment of their rights and the procedures for exercising such rights.
- Communicate to A.C.S.A. Steel Forgings SpA promptly through the appropriate instruments the withdrawal of consent by the interested party.



Freedom of Choice

A.C.S.A. Steel Forgings SpA undertakes to limit processing activities to the minor possible number and to respond to any legitimate request for data from the interested parties. In order to preserve rights and freedoms of the individuals A.C.S.A. Steel Forgings SpA orders:

- a) All information shall give details of how the interested persons may exercise their rights.
- b) All requests from interested parties concerning the exercise of one or more rights under the applicable law shall be verified no later than one month after receipt by the data controller or the data processor.
- c) All those concerned with the treatment are given the right to choose whether or not to transmit their data to non-EU countries.

Purpose of the treatment

Lawful purposes

A.C.S.A. Steel Forgings SpA without prejudice to the provisions of European Data Protection Law, undertakes to pursue only and exclusively legitimate purposes in the processing of personal data.

A.C.S.A. Steel Forgings SpA therefore orders:

- a) Any purpose of the data processing shall include the request of consent by the interested.
- b) The purpose of the treatment is to be set out in the clearest and most comprehensible manner by the interested person in two languages: Italian and English.

Purposes description

A.C.S.A. Steel Forgings SpA subject to the provisions of European data protection legislation, undertakes to describe the purposes of the treatment in the most complete and comprehensible form for all persons interested in the treatment.

Any updating of whole or part of the information given to the data subject of the treatment must be communicated in the most appropriate manner to the interested parties.

Limitations to data collection

A.C.S.A. Steel Forgings SpA undertakes to collect only the appropriate, relevant and strictly necessary data for related purposes according to the principle of data minimization.

A.C.S.A. Steel Forgings SpA it undertakes to collect sensitive data (such as genetic data, health data, biometric data) only with express permission from the party concerned.

A.C.S.A. Steel Forgings SpA undertakes to collect personal data of the data subjects under the age of 16 only if expressly authorized by the holder of the parent's liability.



Data minimization

A.C.S.A. Steel Forgings SpA according with the European law on privacy by default, adopts the principle of "minimizing the data", while processing data subject's. This principle is structured in the following technical and organizational measures.

1. "Need to know privilege"

Users will have access only to data that match their authorization level. This will enable users to perform only a defined range of activities related to their business role.

2. Collection limitation

A.C.S.A. Steel Forgings SpA collects as few as possible personal data and only those strictly necessary for the purposes of the specific treatment.

3. Data erasure

All personal data and copies that are no longer required for the purpose of the processing will be canceled according to the data retention period declared in the information.

This timeline remains indicative as some categories of data for certain treatments may have specific legislative obligations in terms of data retention.

4. Data dissemination

The dissemination of personal data of the individuals between partners, employees and customers is deprecated and forbidden. The company authorizes the transmission of the personal data of the data subjects only to those categories of recipients indicated at the time of the collection of consent. The dissemination of personal data should reflect the company's internal policies regarding the transfer of personal data, defined as "Information Security Policy".

5. Securing databases using cryptography

All databases containing personal data must provide data encryption by default using encryption algorithms:

6. Mobile devices cryptography

All mobile devices (Laptop and smartphones) on which they reside, transit or are carried out processing operations on the personal data of the data subjects, must be protected by the use of encryption solutions.

For further information on data minimization and other security measures, refer to the "Policy for the acceptable use of information tools and information data"

Limitations on the use, storage and divulgation

General limitations

All employees who share personal information receive proper instructions on how to treat the personal data and business devices with which they process the data.

It is forbidden to:

- a) Store copies of the data subject's personal data on personal devices.



- b) Store copies of the data subject's personal data on private-cloud.
- c) Utilize unprotected USB devices for personal data transfers (especially sensitive data)
- d) Communicate data subject's personal data to unauthorized personnel.
- e) Utilize personal data communication tools unauthorized by A.C.S.A. Steel Forgings SpA .

It is recommended to:

- a) Utilize the personal data of the data subjects solely and exclusively for the purposes agreed with them.
- b) Periodically check the correct use of the personal data of the data subjects by suppliers, partners and third parties in general.
- c) Utilize only and exclusively the secure communication tools prepared by the company for the transfer of data to third parties.
- d) Safely destroy all material copies of the data (paper support) at the end of processing activities or alternatively at the end of the retention period of personal data. (See safe disposal procedure in Policy for the acceptable use of information tools and information data").
- e) Safeguard all paper copies of personal data in secure archives.
- f) Ensure that all personal data of the data subjects are being deleted from all digital archives at the end of the conservation period agreed at the time the consent is collected.

For security measures refer to the policy "Acceptable use of corporate instruments" and "Information Transfer Policy"

Temporary files safe cancellation

All temporary files and documents that may contain personal data must be deleted at the end of the agreed conservation period when the consent is collected.

In this regard, all information systems and applications must have a "garbage collection" procedure in order to prevent the personal data of the data subjects from being inadvertently available in unallocated memory areas.

Data processor notifications

All those responsible for the treatment external to the company, must notify the data controller of the disclosure of personal data to third parties.

Notifications content could be:

- a) Requests for access to data by the judicial authority
- b) Requests for access to data by public administration.

A.C.S.A. Steel Forgings SpA contractually binds all external data processors to such obligations.

For further details, see standard contract attachment "**Data protection requirements**".



Records of access to personal data

The data processor of external processing must maintain and update a third-party access data record. For third parties it is meant:

- a) Public administration**
- b) Law enforcers**
- c) Third parties audit**

Within the register the data processor is required to register:

- a) Date**
- b) Name of the personnel that accessed to personal data**
- c) Personal data access purposes**

A.C.S.A. Steel Forgings SpA contractually binds all data processors both internal and external to such obligations.

For further details, see standard contract attachment "**Data protection requirements**".

Use notification of subcontractors by the data processor

The external data processor, appointed by the data controller must communicate to the former the use of companies under subcontracting for the execution of processing activities. The data processor must inform the data controller of the use of subcontracting companies prior to the start of treatment activities.

A.C.S.A. Steel Forgings SpA reserves the right to terminate the contract as a result of any change.

Any change by the data processor shall be notified promptly and he shall receive the appropriate authorization from the data controller before is possible to proceed with the appointment of a subcontractor.

The data processor undertakes to:

- a) Submitting to the subcontracting company the security provisions prepared by the data controller.
- b) Notify to the data controller the country in which the subcontractor performs his / her duties.

For more details see the attached standard contract "**Requirements for the protection of personal data**".

Accuracy and quality

A.C.S.A. Steel Forgings SpA in order to implement a system designed to determine the quality of personal data, establish the following:

- a) All changes to personal data must be tracked and must report the author of the modification and the date.



- b) Systems and methods of data collection must guarantee the completeness and accuracy of personal data.
- c) The accuracy of personal data collected from sources outside the company must be checked before processing them.

Communications and transparency

Informations

A.C.S.A. Steel Forgings SpA has prepared one or more information to collect the consent. Such informations are in accordance with the applicable data protection legislation.

All employees are required to use only and exclusively the information provided by the company.

All consensus-gathering informations are disclosed to the data subjects at the time of the approval of the consensus.

All informations provided by the company are available to the public at the company's websites and easily reachable by the data subjects.

Copies of the informations are delivered electronically to all those who have given their consent to the data processing via telephone. A track of effective reporting is maintained at company systems throughout the duration of the treatment.

For all those treatments in which it is not possible to collect the consent of the data subjects or even to provide information, it will be assignment of the company to provide appropriate tools. (eg: CCTV advertisement)

Transparency

A.C.S.A. Steel Forgings SpA , in order to facilitate the exercise of the rights of the data subjects, has prepared a set of appropriate procedures and communicates the existence of the rights to them at the time of the collection of the consent.

Data subjects rights

Right of access

A.C.S.A. Steel Forgings SpA in order to guarantee the right of access to personal data by the data subjects, as provided by the legislation in force in Article 15 of EU Regulation 2016/679, has prepared the specific e-mail address privacy@acsa.it with which the interested parties can send to A.C.S.A. Steel Forgings SpA the requests envisaged by the GDPR.

A.C.S.A. Steel Forgings SpA provides to set clear the modalities of exercising this right at the moment of the consensus collection to all data subjects.



Data rectification

A.C.S.A. Steel Forgings SpA in order to guarantee the right of rectification of personal data by data subjects, as provided for by the regulations in force in article 16 of EU regulation 2016/679, has prepared the specific e-mail address privacy@acsa.it, for which the interested parties can exercise this right.

A.C.S.A. Steel Forgings SpA provides to set clear the modalities of exercising this right at the moment of the consensus collection to all data subjects.

Right to data erasure

A.C.S.A. Steel Forgings SpA in order to guarantee the right of personal data to be deleted by the data subjects, as provided for by the regulations in force in Article 17 of the EU 2016/679 Regulation, has prepared the specific e-mail address privacy@acsa.it, for which the interested parties can exercise this right.

A.C.S.A. Steel Forgings SpA provides to set clear the modalities of exercising this right at the moment of the consensus collection to all data subjects.

Right to treatment limitation

A.C.S.A. Steel Forgings SpA in order to guarantee the right to limit the processing by the interested parties, as required by the legislation in force in Article 18 of the EU 2016/679 Regulation, has prepared the specific e-mail address privacy@acsa.it, for which the interested parties can exercise this right.

A.C.S.A. Steel Forgings SpA provides to set clear the modalities of exercising this right at the moment of the consensus collection to all data subjects.

Right to portability

A.C.S.A. Steel Forgings SpA in order to guarantee the right to portability, as required by the legislation in force in Article 68 of the EU 2016/679 Regulation, has prepared the specific e-mail address privacy@acsa.it, for which the interested parties can exercise this right.

A.C.S.A. Steel Forgings SpA provides to set clear the modalities of exercising this right at the moment of the consensus collection to all data subjects.

Requests and complaints management

A.C.S.A. Steel Forgings SpA in order to promptly and fully satisfy the complaints and requests from data subjects about the methods of exercising their rights, it has established an internal complaints management process.

All data subjects will be able to express complaints or requests by contacting privacy@acsa.it

A.C.S.A. Steel Forgings SpA undertakes to comply with the deadline established by law of 30 days to respond to the data subjects. This deadline may eventually be increased to 60 days upon communication to the data subjects in the first thirty days.



A.C.S.A. Steel Forgings SpA provides to set clear the modality access to this service at the moment of the consensus collection to all interested parties.

Responsability

A.C.S.A. Steel Forgings SpA in order to ensure compliance with the current legislation on the protection of personal data, it has defined a pattern of internal responsibility towards data protection and management.

Governance model

A.C.S.A. Steel Forgings SpA is the owner of the processing of personal data. In order to protect individual liberties and the rights of those involved, A.C.S.A. Steel Forgings SpA contractually binds its employees involved in the processing of personal data of the interested parties.

Data protection impact assessment

A.C.S.A. Steel Forgings SpA undertakes to perform and review every three years, in accordance with articles 35-36 EU regulation 2016/679 **data protection impact assessments** in the cases provided by the law.

Impact assessment will produce those outcomes:

- a) Identification of risks for the data subject
- b) The definition of security measures for the specific treatment

A.C.S.A. Steel Forgings SpA at the request of the guaranteeing authority, undertakes to provide the said authority with a copy of the assessments carried out.

Security requirements for third parties and external processors

A.C.S.A. Steel Forgings SpA undertakes to guarantee the data subject the same level of security even when such data is processed on behalf of the company by third parties.

In this regard, A.C.S.A. Steel Forgings SpA has prepared a contractual attachment called **"Requirements for the protection of personal data"**

A.C.S.A. Steel Forgings SpA undertakes to demand the signing of this contractual annex to all third parties involved in data processing.

A.C.S.A. Steel Forgings SpA also reserves the right to carry out checks on the third parties who are signatories to the annex.

Internal controls

A.C.S.A. Steel Forgings SpA , as Data Controller, undertakes to verify the compliance of the various business functions with this policy and in accordance with the provisions of art. 37-39 of EU Regulation 2016/679.



Education and awareness

A.C.S.A. Steel Forgings SpA undertakes to promote a company culture sensitive to the issue of personal data protection. A.C.S.A. Steel Forgings SpA believes that the training of personnel on these issues is fundamental and therefore has prepared special training modules for all employees who are preparing to take up employment with the company. This formation is available to all A.C.S.A. Steel Forgings SpA personnel.

Personal data security report

A.C.S.A. Steel Forgings SpA in order to guarantee an adequate level of information about the protection of personal data, will provide an annual report on the security of personal data to the board of directors of A.C.S.A. Steel Forgings SpA.

Data protection regulation compliance

Records of data processing

A.C.S.A. Steel Forgings SpA in accordance with the art. 30 of EU regulation 2016/679, maintains and updates a register of processing activities.

The register contains:

- a) Data controller**
- b) Data processor**
- c) Data subjects categories**
- d) Categories of data provided by data subjects**
- e) Any data transfers outside the EU**
- f) Data processing activities**
- g) Purpose of the processing**
- h) Data retention time**

The responsibility for maintaining the registry is on Data Controller

Security incidents register

A.C.S.A. Steel Forgings SpA in accordance with article 33 par 3 paragraph 5 of EU regulation 2016/679, maintains and updates a record of security incidents involving the personal data of the data subjects.

Life cycle of the security incident

A.C.S.A. Steel Forgings SpA in order to guarantee the individual freedom of those involved, manages the life cycle of security incidents involving personal data. This process therefore



requires constant monitoring of the vulnerabilities and potential effects of security incidents on personal data.

In this regard, A.C.S.A. Steel Forgings SpA reserves the right to notify the incident also at a later stage in regard to the detection of the incident following the changes in the security measures or potential impact for the interested parties.

Security incidents and notification

Should a security incident occur involving the personal data of the data subjects, A.C.S.A. Steel Forgings SpA undertakes to respond promptly in order to guarantee the individual rights and liberties of the data subjects pursuant to art. 32-34 of the EU 2016/679 regulation.

1. Modality of notification to data subjects

A.C.S.A. Steel Forgings SpA depending on the nature of the accident, could inform all those affected that the security incident occurred. The methods of communication of the incident could vary depending on the nature of the incident and the number of data subjects involved.

2. Notification to the national guarantor

A.C.S.A. Steel Forgings SpA will provide, depending on the severity of the incidents occurred, adequate notification to the national privacy guarantor no later than 72 hours from the time the accident was detected.

Data transfers outside EU borders

A.C.S.A. Steel Forgings SpA in accordance with art. 44-49 of EU Regulation 2016/679 prohibits the transfer of personal data of European citizens outside the borders of the Union.

A.C.S.A. Steel Forgings SpA undertakes to request formal authorization from data subjects before processing the transfer of data abroad. A.C.S.A. Steel Forgings SpA undertakes to transmit such data through secure communication channels and to carefully select any foreign third parties that will be involved in data processing activities.