



Acceptance of Carraro Group Code of Ethics adopted by each Carraro Group company



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Messrs.

Subject:

Acceptance of Carraro Group Code of Ethics adopted by each Carraro Group company

Dear Sir/Madam,

You are hereby requested to declare Your awareness of the principles set out by Carraro Group Code of Ethics adopted by the Carraro Group Company your customer (hereinafter the ‘Company’, or one of the companies being part of Carraro Group¹) and freely available in Carraro Group website <https://www.carraro.com/en/who-we-are/corporate-governance> and to undertake to act accordingly to its provisions.

Moreover we wish to inform You that the respect of such provisions is a fundamental factor of the business organization of the Company and that any non-compliance with the provisions of the aforementioned Code of Ethics constitutes a serious breach of the obligations in our business relationship, entitling the Company to terminate any agreement with immediate effect by means of a notice, without prejudice to the right to seek compensation for any damages suffered.

Andrea Conchetto

CEO



For acceptance

Supplier’s Company stamp

Date, _____

Authorised signature

1 The structure of Carraro Group is reported at the following web address <https://www.carraro.com/en/who-we-are/global-presence>

Personal Data Processing Disclosure

Customers/Suppliers

The companies **Carraro S.p.A.**, **Carraro Drive Tech Italia S.p.A.**, **Carraro International S.E.**, **Driveservice S.r.l.** and **SIAP S.p.A.** (hereinafter each individually as “Company”), pursuant to Art. 13 of EU Regulation no. 679/2016, wish to inform you that your customer/supplier data will be processed as reported below.

Keep in mind that each of the companies listed above is considered the Controller of the data processing (hereinafter also “Controller”) to the extent and within the limits in which you maintain relations with the same.

1. Data Controller

The Data Controller is the Company, in the person of its legal representative pro tempore, with registered offices as following:

- › **Carraro S.p.A.:**
via Olmo 37, Campodarsego, PD, tel. +39 049 9219111,
certified email address carraro.group@legalmail.it;
- › **Carraro Drive Tech Italia S.p.A.:**
via Olmo 37, Campodarsego, PD, tel. +39 049 9219111,
certified email address carrarodt.italia@legalmail.it;
- › **Carraro International S.E.:**
via Olmo 37, Campodarsego, PD, tel. +39 049 9219111,
certified email address carraro.international@legalmail.it
- › **Driveservice S.r.l.:**
via Olmo 37, Campodarsego, PD, tel. +39 049 9219111,
certified email address driveservice@legalmail.it;
- › **SIAP S.p.A.:**
via Monfalcone 4, Maniago, PN, tel. +39 0427 706911,
certified email address siap@legalmail.it.

2. Purposes, legal basis of the processing of personal data, nature and consequences arising from not providing your data

The Company informs you that for the establishment and execution of the current contractual relationship it has with you, it will come to possess your personal data, including that acquired verbally.

This data is processed for the following purposes:

- (i) **formalisation and/or stipulation of contracts;**
- (ii) **implementation and operational management of the contract**, as well as all activities closely related and connected, deriving from and instrumental to the same;
- (iii) **tax and administrative-accounting.**

Legal basis of the processing are contract and legal obligations, pursuant to art. 6 par. 1 letters b) and c) of EU Regulation n. 679/2016.

In the case of suppliers – natural persons, for the processing of economic-financial data, such as commercial information and financial statements, the Company avails itself of the exemption of letter 6.1 f) (legitimate interest of the Company to verify the economic-financial solidity of its business partners).

The provision of your personal data is necessary in order to allow the Company to fulfil its contractual and/or legal obligations; refraining from providing the same will make it impossible for the Company to carry out these contractual relations.

3. Processing methods and storage period

Your personal data will be processed in written and/or magnetic, electronic or telematic form and with tools that are in any case automated, with logic that is strictly correlated to the indicated purposes and, in any case, so as to ensure the security and confidentiality of the data.

Your personal data will be processed for the entire duration of the contractual relationship established with you and for the execution of legal and administrative-accounting obligations to be borne by the Controller for a maximum period of ten years from the termination of the relationship.

In any case, your personal data will be kept until the expiry of the time limit established for the Controller’s exercise of its rights and fulfilment of its obligations underlying the processing carried out.

Please note that your personal data will always be processed by the Controller’s personnel, who have been duly instructed and trained by the Controller.

4. Recipients of Personal Data

Personal data may be communicated, in close relation and in accordance with the aims set out above, to the following categories of subjects:

- › Credit institutions;
- › subjects whose right to access Personal Data is recognised by legislative provisions, including European Community provisions;
- › subjects to whom the communication of personal data is necessary or in any case functional to the carrying out of the activities of our Company (for example: persons entrusted to provide legal and contractual advice, insurance companies, credit recovery companies, credit insurance companies, commercial information/customer solvency companies, etc.).

Personal data will not be distributed to third parties except in the cases provided for by law.

The subjects belonging to the categories referred to above operate in total autonomy as independent data controllers; that is, subjects responsible for carrying out activities in the interest of the Controller. The list of responsible subjects can be requested from the following email addresses:

- › **Carraro S.p.A.:** carraro.group@legalmail.it;
- › **Carraro Drive Tech Italia S.p.A.:** carrarodt.italia@legalmail.it ;
- › **Carraro International S.E.:** carraro.international@legalmail.it;
- › **Driveservice S.r.l.:** driveservice@legalmail.it;
- › **SIAP S.p.A.:** siap@legalmail.it.

5. Transmission of personal data within Group companies located within and outside the EU

The Controller may transmit your personal data to Group companies belonging both to European Union and non-European Union countries (“third countries”) in order to allow the centralised management of customers’/suppliers’ data (given the Controller’s legitimate interests to ensure uniformity in its administrative management). More specifically, the personal data will be transferred according to Article 44 – General principle for transfers; Article 45 – Transfers on the basis of an adequacy decisions; Article 46 – Transfers subject to appropriate safeguards (including with contractual clauses and other provisions referred to in Article 46, para. 3); Article 49 – Derogations for specific situations. The data subject may obtain information on the safeguards for the transfer of data by sending an e-mail at the e-mail addresses reported at art. 1).

With specific reference to the risks arising from the cross-border processing of personal data in the third countries, the same will be mitigated by Carraro Group internal guidelines and operating instructions on privacy matters, in accordance with the general principles at the core of the Regulation, and by the ban implemented within Group companies for carrying out any erasing, copying, dissemination and/or disclosure of the data without proper authorisation.

6. Rights of the data subject

We inform you that insofar as the processing is concerned, you have the right to obtain the following from the Controller:

Right to access: (Art. 15 of the Regulation)	confirmation as to whether or not your personal data undergoes ongoing processing; in this case, you have the right to obtain, <i>inter alia</i> , access to your personal data and information regarding the scope of the processing, the categories of personal data in question, the recipients or categories of recipients to whom the personal data has been or will be sent.
Right to rectification: (Art. 16 of the Regulation)	(i) rectification of incorrect personal data regarding you without undue delay and (ii) integration of your personal data where it is incomplete.
Right to erasure (“right to be forgotten”): (Art. 17 of the Regulation)	erasure of personal data regarding you without undue delay (the Controller is obliged to erase your personal data without undue delay in the cases provided for in Article 17 of the Regulation).
Right to restriction of processing: (Art. 18 of the Regulation)	restriction of the processing in the cases referred to in Article 18 of the Regulation.
Right to data portability: (Art. 20 of the Regulation)	the right to receive the personal data regarding you which you have provided to the Controller, in a structured, commonly used and machine-readable format and the right to transmit such data to another controller without hindrance from the Controller to which the personal data has been provided in Article 20 of the Regulation.
Right to oppose processing carried out pursuant to Article 6, paragraph 1, letters e) or f): (Art. 21 of the Regulation)	the right to object, on grounds relating to your particular situation, to the processing of personal data concerning you at any time, which is based on Article 6, paragraph 1, letters e) or f), including profiling based on those provisions.

The Data Subject also has the right to **lodge a complaint with the Guarantor for the Protection of Personal Data** if he or she holds that the processing involving him or her infringes a provision of EU Regulation no. 679/2016.

To submit requests relating to the exercise of your rights as listed above, **including the further right to withdraw previously-provided consent at any time if expressly requested**, as the data subject you can contact the Controller by filling out the form posted on the website <https://www.carraro.com/en/products-and-services/supplier/> and sending it to the Controller at the relevant certified email address or by regular post.

The full text of the articles of EU Regulation no. 679/2016 governing your rights is published on the website of the privacy Guarantor <http://www.garanteprivacy.it/>.

To request any information and/or clarifications please use the contact details listed in Art. 1.

The Data Controller **Carraro S.p.A.**

The Data Controller **Carraro Drive Tech Italia S.p.A.**

The Data Controller **Carraro International S.E.**

The Data Controller **Driveservice S.r.l.**

The Data Controller **SIAP S.p.A.**