	<b>INFORMATION SECURITY AND PERSONAL DATA PROTECTION POLICY</b>	<b>COD: PLY_00</b>	
		REV. 00	Data / Date: 16/02/2026
<b>PRIVACY POLICY</b>		Pag. 1 a 3	

## 1. Information Security and Personal Data Protection Policy

Trancerie Emiliane S.p.A. recognizes that its information assets play a vital strategic role and represent a core corporate asset that demands rigorous protection.

Furthermore, the Company is committed to safeguarding the fundamental rights of individuals regarding their personal data. We ensure that all data processing is conducted in full compliance with current regulations, adhering to the most advanced industry best practices.

To this end, Trancerie Emiliane S.p.A. has adopted this information Security Policy. This framework is aligned with leading national and international standards-specifically **TISAX** and **ISO/IEC 27001:2022**-as well as mandatory legal requirements, including the European General Data Protection Regulation (GDPR).

Information Security is defined as the preservation of:

- **Confidentiality:** ensuring that information is accessible only to those authorized to have access;
- **Integrity:** safeguarding the accuracy and completeness of information and its processing methods;
- **Availability:** ensuring that authorized users have timely access to information and associated assets when required.

**Furthermore, personal data protection is grounded in the following principles:**

- **Lawfulness, fairness, and transparency:** ensuring processing is conducted legitimately and transparently towards the data subject;
- **Purpose limitation:** ensuring data is collected for specified, explicit and legitimate purposes;
- **Data minimization:** meaning data must be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed;
- **Accuracy and currency:** ensuring data is accurate and kept up to date, including the timely erasure of any data that is inaccurate regarding the purposes of the processing
- **Storage limitation:** ensuring data is kept in a form which permits identification of data subjects for no longer than is necessary.

Trancerie Emiliane S.p.A. is committed to ensuring the Confidentiality, Integrity, and Availability of not only its own corporate information but also that of its customers, employees, and stakeholders at large. This commitment is deeply embedded in our corporate culture through the application of core principles, such as “need-to-know,” “least privilege,” “risk-based thinking,” and “security by design & by default.”

Driven by this commitment and guided by these principles, Trancerie Emiliane S.p.A. has implemented an Information Security and Personal Data Management System. This system serves as a robust control framework that-through organizational, physical, technological, and personnel management measures-enables Management to ensure that the security of information (including

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personal data) is the result of sustainable, structured management rather than mere coincidence or individual effort.

Indeed, Trancerie Emiliane S.p.A. believes that security achieved solely through technical measures is inherently limited; it must be reinforced by sound information security management procedures and constant, risk-orientated system monitoring dedicated to continuous improvement. Furthermore, it requires the active training and awareness of all parties involved

The Company recognizes that the security of information and personal data is the tangible result of the responsible, competent commitment and participation of everyone: employees, customers and suppliers alike.

**The Information Security and Personal Data Protection objectives of Trancerie Emiliane S.p.A. are:**

- **Upholding the Confidentiality, Integrity, and Availability** of all information (both business and personal) belonging to the Company, its employees, suppliers and customers. This ensures that all data is managed in strict accordance with national and international regulatory requirements, contractual obligations, and the industry standards to which the Company adheres.
- **Integrating information security and personal data management system requirements** into all business processes, while ensuring the management system remains consistently updated, monitored, and driven by a commitment to continuous improvement.
- **Assigning roles and responsibilities** to qualified and competent personnel, free from conflicts of interest or undue influence, to establish a clear management framework for information security and personal data. This spans across governance, incident management (including Data Breaches), crisis management, and business continuity.
- **Remaining proactive toward risks and opportunities** arising from both internal and external contexts, ensuring a consistently up-to-date understanding of potential impacts on the information managed by the Company and fostering a prompt, effective response.
- **Providing comprehensive training and fostering awareness** among employees regarding information security and personal data protection. This includes education on the implemented management system, its policies, procedures, and regulations, as well as the potential risks-which are becoming increasingly frequent and complex-and the best methods to prevent them.
- **Ensuring timely communication** with competent authorities and stakeholders regarding any information security or personal data events that may have a significant impact. Such communications are conducted in accordance with contractual agreements and national or international regulations, while maintaining all necessary records to reconstruct the events and identify their root causes.

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- **Adopting appropriate physical and technological preventive measures**, and establishing incident response plans for managing crises, security incidents, and data breaches (both actual and potential); ensuring that robust safeguards are in place to preserve the continuity of information security and personal data protection.
- **Ensuring that information security and personal data protection standards are upheld throughout the supply chain** and within the technologies utilized by Trancerie Emiliane S.p.A. This involves communicating clear security expectations to all partners and establishing a transparent division of responsibilities for the security information exchanged within the contractual relationship, in full compliance with current regulations.
- **Preventing copyright infringement and loss** by monitoring the software utilized-whether cloud-based (Software as a service-SaaS) or licensed-especially regarding the integration of Generative AI.
- **Assessing the information Security and Personal Data Management System** through independent, qualified third-party organizations.

Trancerie Emiliane S.p.A. hereby establishes this Information Security Policy and is dedicated to achieving its strategic objectives. This policy is subject to review in the event of any significant changes that may impact the Company's security and data protection goals

The Management

## 2. Policy Effectiveness & Review

This policy takes effect immediately upon publication. To ensure its ongoing relevance and alignment with corporate goals, it undergoes formal verification during the annual Management Review.

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