

Privacy Policy

The Hera Group intends to pursue a strategy of multi-business growth which involves personal data protection based upon principles of Lawfulness, Fairness, Transparency, Restriction of purposes and storage, Minimisation of data, Accuracy, Integrity and Confidentiality.

That Policy, in coherence with the Mission, Values and Strategy, defines a set of principles to be adopted and translated into balanced objectives, to ensure constant respect of the rules on the protection and security of information, particularly personal data, monitored and reviewed periodically so that it always remains in line with the Group 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 every individual;
- ✓ protecting the personal data of every individual;
- ✓ respecting fundamental freedoms in relation to privacy, also by guaranteeing legislative conformity;
- ✓ reducing the use of personal data to the minimum strictly necessary to achieve the declared purposes;
- ✓ restricting the personal data processing only to that pertinent for certain, explicit and legitimate purposes, with methods, instruments and storage limits proportional to the purposes to be achieved;
- ✓ providing to the data subject updated information and easily accessible and comprehensible communications on personal data processing;
- ✓ guaranteeing the correctness and reliability of the data processed, through their verification and update;
- ✓ guaranteeing the rights of the data subjects laid down with regard to privacy;
- ✓ respecting the rules on personal data processing.

OBJECTIVES PURSUED

Continuous improvement of Personal Data Protection through:

- the adoption of an adequate and updated documentary system integrated into the Group system (guidelines, procedures, operating instructions, standard document models);
- the identification and assessment of aspects connected to risks deriving from personal data processing as early as in the phase of defining/designing/reviewing the company processes (privacy by design and privacy by default);
- the definition of an organisation model adequate to the control of personal data processing relating to each company process;
- the identification of company roles equipped with adequate requirements and powers to guarantee the correct functioning of the privacy management system;
- the adoption of suitable security measures to prevent and reduce to a minimum personal data processing risks;
- the adoption of the best available and economically sustainable techniques to limit the damage in case of incidents or negative events in relation to personal data processing and for the methods of restoring the data in the case of accidental damage and loss.

Involvement of stakeholders and protection of personal data with actions aimed at:

- raising awareness of employees, suppliers, customers, shareholders and citizens on the goals, objectives and commitments assumed in relation to personal data processing;
- motivating and involving employees to achieve the set objectives and to develop, at every level, a sense of responsibility in relation to the personal data protection and information security;
- training and informing on lawful and fair processing of personal data and information security;
- promoting dialogue and discussion with the stakeholders (public administration, authorities, citizens, associations, customers, workers, etc.), taking account of their requests, on personal data processing, in coherence with the instruments of participation and communication adopted by the Group.

The Herambiente S.p.A. Board of Directors recognises as a strategic choice the development of a management system for personal data protection integrated and shared at Group level and applicable to all Subsidiaries.

The Group companies' data Controllers are involved in respecting and implementing the commitments contained in the aforementioned Policy, guaranteeing and periodically checking that the Policy is documented, operative, reviewed and disseminated to all personnel and transparent to all stakeholders.

Bologna, 05/11/2018

The Chairman
Filippo Brandolini

The Managing Director
Andrea Ramonda