

PRIVACY NOTICE GDPR N.679/2016

<u>Controller of the personal information</u>
Trelleborg Coated Systems Italy S.p.A, reg. no. 10051150158, R.E.A. no. 1337282
Via Vittor Pisani 20, Milan, Italy

Offices: Strada Provinciale 140, 26855 Lodi Vecchio (Lodi), Italy email: printingsm@trelleborg.com

The purpose of this privacy notice is to explain how, and for what purposes, we use your personal information. Please read this privacy notice carefully.

How do we collect information from you?

We obtain information about you when you contact us about products and services, use our website, complete an online registration form to receive regular updates from us and/or to download a product literature, whitepaper, webinar or video, open/click on an e-mail from us, visit us during international and local trade fairs.

We also collect information from other sources, including business directories and other commercially or publicly available sources. If we collect personal information about you from another source than from you, we will tell you about the source in our next communication with you.

What type of information is collected from you?

The personal information we collect might include the following:

- Your first and last name
- Your email address;
- Your company name;
- · Your business phone number;
- Your location;
- Your job title;
- Type of industry within which your company operates;
- Your IP address;
- Your interests relating to our products and solutions;
- Information regarding what web pages and downloads you have accessed and when.

How we use your personal information

Trelleborg will use your personal information to inform you of any marketing promotional information/campaign with regard to Trelleborg's printing solutions operations;

We may share such personal information with our parent company or other Trelleborg subsidiaries such as our overseas facilities and commercial offices exclusively for the purpose of carrying out marketing and promotional activities.

We may store personal information into the Trelleborg's printing solutions operations CRM data base.

Profiling

We can use your personal information to create a profile of your interests and preferences in products and solutions in the printing industry so that we can contact you with information relevant to you. By submitting a form on the website or campaign landing pages you will enter our database where we will tailor communications and target based on the demographic or marketing preference information to the information you provide. From here we will also collect intent data such as (and not limited to) email clicks, form submissions, visits to our website and use a mixture of this profile and engagement information to determine whether you have a current interest in our solutions; this ensures that as well as delivering highly targeted communications, we only follow up with people who are highly engaged or have a



current interest in our solutions. We may also make use of additional information about you when it is available from external sources such as but not limited to Google Analytics to help us do this effectively.

What is the legal basis for our processing?

The legal basis for our processing of your information is that the processing is necessary in order to fulfil our legitimate interest to provide you with the products, services and information you have ordered or requested, to answer questions and handle feedback from you, to market our products, identify business opportunities and increase sales. We have reduced the scope of the personal information we do collect to a minimum in order to provide the personalized communications to you that we believe you would anticipate getting. The personal information collected are limited to you in your professional capacity and does not intrude your privacy on a personal level. Our profiling is made based on your interest shown, location data, digital engagement (email opens and clicks, form fills, webpages visited, assets downloaded) and we also store data from your IP address, but the profiling is limited and in no way constitutes a comprehensive picture of you or your habits and interests, nor does it produce any legal effects concerning you.

Transfer of your Personal Data

Due to the way our Group of companies operate, we on the basis of our legitimate interest in organizing our business, may share your information with other entities within the Trelleborg Group. We may transfer such personal information to countries, territories, or organisations that are located outside the European Economic Area (EEA) and are not recognised as ensuring an adequate level of protection by the European Commission. In such case, Trelleborg provides appropriate safeguards to protect your personal information, such as the use of standard data protection clauses adopted by the European Commission or a relevant EEA national data protection authority.

Moreover, we may disclose your information to external parties, such as vendors and service providers processing your information under the instructions of Trelleborg. Where such disclosure entails transfers of your information outside the EU/EEA, we will ensure that the standard data protection clauses adopted by the European Commission have been entered into between the transferring Trelleborg entity and the receiving external party. Alternatively, other safeguards will be put in place prior to such transfers.

We will not sell your personal information to third parties.

Marketing communications

If you do not wish to receive any direct marketing communications from us about our products/solutions/latest innovations you may at any time withdraw from our marketing database by clicking on the 'unsubscribe' or 'opt-out' link in our communications or email us at printingsm@trelleborg.com. This would not affect any communication we may have with you as a customer, not qualifying as direct marketing.

Retention

We will retain your information for a period necessary to fulfil the purposes outlined in this privacy notice, for a period of one year from the time of your last engagement with us or from the time our contractual relationship or rights and obligations has ended, all unless a longer retention period is required or permitted by local law to which we are subject.

We are using the following criteria to establish our retention period: (i) as long as we have an ongoing relationship with you (either as an individual or in your capacity as employed by one of our corporate customers, suppliers or co-operations partners); (ii) as required by legal obligations to which we are subject (such as tax and accounting obligations); and (iii) as advisable in light of our legal position (such as applicable statutes of limitations).

Security

Your personal information is stored in a secure cloud environment. We will ensure that the access to your information is accurately secured by applying appropriate safeguards, depending on the circumstances taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk. In support of this commitment, we have implemented appropriate technical, physical and organizational measures to protect your information against: unauthorized or accidental destruction, alteration or disclosure; misuse; damage; theft or accidental loss; or unauthorized access.



How to check and update your information

To check what information we handle about you, you can email printingsm@trelleborg.com.

You have the right to request information about the categories of information concerning you that we are processing and how your personal information is being used by contacting us in writing using the contact details below. You can also contact us should you want your personal information corrected, updated, deleted or restricted in any way. In certain situations, you also have the right to object to the processing of your personal information. For the protection of your privacy and your personal information, we may require that you identify yourself in connection with such a request.

Lodging a complaint

You have the right to complain to a supervisory authority; the contact information for that supervisory authority is provided below:

Garante per la protezione dei dati personali - Piazza di Monte Citorio n. 121 00186 ROMA, Italy - Fax: (+39) 06.69677.3785 - phone: (+39) 06.696771 - E-mail: garante@gpdp.it

Contact us

If you have any questions related to the information above, if you suspect that a breach of this privacy notice has occurred, if you would like to obtain a copy of the safeguard mechanisms put in place to protect your information in case of any transfer of the information outside the EEA, or if you would like to contact us for any reason stated above, please contact us at:

Trelleborg Coated Systems Italy S.p.A Main offices: Strada Provinciale 140, 26855 Lodi Vecchio (Lodi), Italy email: printingsm@trelleborg.com

Lodi Vecchio, May 25th, 2018