

I V E C O • G R O U P

Company Iveco Group	DATA PRIVACY POLICY	
Function Legal & Compliance	Effective Date January 2022	Pages 3

1 Scope

This Policy applies to Iveco Group N.V. and its subsidiaries (collectively, “Iveco Group” or the “Company”) and the directors, officers and employees of such entities as well as those acting for or on behalf of such entities.

2 Purpose

This document sets forth Iveco Group’s policy regarding information privacy and personal data processing in order to comply with applicable laws, so as to ensure data subjects’ rights.

3 Definitions

Personal Data: Personal Data is any data that relates to, or can be used to identify, an individual natural person (“Data Subject”). This includes the obvious, like full name, home address, phone number, and email address, but also the not-so-obvious items like IP address and geolocation information.

Privacy: Privacy has multiple definitions, depending on local culture and legislation. In general, Privacy is the ability of the individual to seclude themselves, or information about themselves, and thereby express themselves selectively.

Data Privacy: Data Privacy (also known as Information Privacy or Data Protection) is the right of the individual to control when, how and to what extent their personal data is collected, maintained and processed by others.

4 Data Privacy Principles

Iveco Group is committed to collecting, maintaining and processing Personal Data in compliance with all applicable laws. In addition, it is Iveco Group's policy to collect, maintain and process Personal Data according to the following principles, regardless of the jurisdiction in which the collection, maintenance, or processing of such Personal Data takes place:

Lawfulness, fairness and Transparency Principle: Personal Data shall be collected for specified, explicit and legitimate purposes and processed fairly and in a transparent manner, where appropriate, with the knowledge or prior consent of the Data Subject.

Data Quality Principle: Personal Data should be relevant to the purposes for which it is to be used and, to the extent necessary for those purposes, should be accurate, complete and kept up-to-date.

Purpose Limitation Principle: Personal Data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Personal Data should not be disclosed, made available or otherwise used for purposes other than those specified, except (a) with the consent of the Data Subject; or (b) as otherwise authorized by applicable law.

Storage Limitation Principle: Personal Data shall be kept in a form which permits identification of Data Subjects for no longer than is reasonably necessary for the purposes for which the Personal Data is processed. This includes archiving of Personal Data relevant to specific laws or necessary to protect Iveco Group in case of legal proceedings.

Security Safeguards Principle: Personal Data shall be processed in a manner that ensures appropriate security of such data, including reasonable protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using reasonably appropriate technical or organizational measures.

Privacy by Design Principle: All Iveco Group functions shall ensure that data privacy is a key consideration in the early stages of any project or activity, and then throughout its lifecycle. For example when:

- Designing a new product or service.
- Building new IT systems for storing or accessing Personal Data.
- Using Personal Data for new purposes.
- Outsourcing activities which include processing of Personal Data.

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Accountability Principle: All Iveco Group functions processing Personal Data are accountable for complying with measures which give effect to both the principles stated above and applicable data protection laws, and must be able to demonstrate compliance.

Additional requirements related to specific regulations are described, if necessary, in dedicated policies, guidelines and/or procedures.

Violation of this Policy may result in disciplinary action up to and including termination of employment.