



MARELLI PRIVACY POLICY
pursuant to Article 13 and 14 of the GDPR relating to the processing of personal data.

Dear Customer,

The companies collecting and processing personal data acting as joint data controllers (“**Data Controllers**” or the “**Companies**” or “**Joint Controllers**”) are:

- Marelli Europe S.p.A. (“**Marelli**”), with registered office in Italy, Corbetta (MI), Via Aldo Borletti 61/63,
- Marelli Holding Co. Ltd. (“**Marelli Holding**”), with registered office at 4-19 Miyahara-cho 2-chome, Kita-Ku, Saitama city, Saitama 331-8501 Japan;
- all the other companies controlled directly or indirectly by Marelli Holding (“**Marelli Affiliates**”), the list of the affiliates is available upon request by email to privacy@marelli.com.

The Companies are committed to protecting any personal data (“**data**”) of the business customers and their representative (“**Customers**”) collected. As Data Controllers, are required, pursuant to Article 13 and 14 of EU Regulation No. 679/2016 (General Data Protection Regulation, “**GDPR**”), to provide the Customers with certain information regarding the processing of personal data. If Customers provide personal data on behalf of someone else, they must ensure, in advance, that the data subjects have read this Privacy Policy. The Companies asks Customers to help it in keeping their personal data updated, informing it of any relevant changes.

To facilitate your understanding of the processing activities carried out by the Joint Controllers, we have prepared this document explaining which processing activities each Company carries out autonomously by each company.

1. Why do Data Controllers process your data?

The Companies already process your data and contact data of the company that you represent or at which you are employed (“**Company**”), due to the contractual relationship with your company.

Please, note that the processing for the purposes stated herein will relate merely to the company you represent. You will not, therefore, receive commercial communications addressed to your person, as a private consumer.

Data Controllers process your personal data and data related to your company jointly for the following purposes:

| PURPOSES | CATEGORIES OF DATA | LEGAL BASIS OF THE PROCESSING |
|--|---|--|
| <i>Purposes necessary to customer satisfaction</i> Companies will processes your data for the purpose of to analyze, review and improve its products and services with a focus on business customer satisfaction. | <ul style="list-style-type: none">• Contact details• Job Title• Company• Country | Companies will rely on the legitimate interest (Art. 6 (1) (f) GDPR) of providing you a better service, in compliance with the relevant legal provisions. |
| <i>Promotional communications</i> Companies may use your data, for marketing purpose to carry out promotional communications addressed to your company, in particular advertising relating to Marelli products and services (including e-mail and newsletter), invites to events relating to their products and services, and market surveys. Through the Survey, Joint Controllers may also collect data on your company’s market preferences for future promotional communications. | <ul style="list-style-type: none">• Contact details• Job Title• Company• Country• Your Company’s Market preferences | Companies may send you promotional communications upon your prior consent (Art. 6 (1) (a) (GDPR) that will be requested in the web consent form. Providing your consent is optional and failure to provide consent will have no consequences other than that we will not provide you promotional content. |



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| <p><u>Legal claims</u> Companies may use your personal data for the establishment, exercise, or defense of legal claims or whenever courts are acting in their judicial capacity.</p> | <ul style="list-style-type: none"> • Personal information (e.g. name, last name) • Contact details • Country • Job Title • Information relating to the relationship of your Company with Marelli | <p>For this purpose, Companies rely on their legitimate interest (Art. 6 (1) (f) GDPR).</p> |

2. How do we share your data?

The duly authorized personnel of the Companies may access your personal data on a need-to-know basis only. Marelli may share your personal data with third parties:

- (i) to other companies of the Marelli Group (affiliate or subsidiaries) for administrative purposes, and, **only with your consent**, for promotional communications;
- (ii) when the communication is necessary to comply with applicable laws and regulations;
- (iii) in case of extraordinary operations (e.g. mergers, acquisitions, transfer of assets, etc.).

The categories of data recipients are authorities, courts, business partners, potential buyers of the Companies' business operations, external consultants (law, accounting firms), the list of which could be provided upon request.

Your personal data are also shared with our service providers (e.g. providers of technical, administrative and / or organizational services, such as IT and hosting support, application providers, marketing providers) acting as data processor on the basis of the instructions they receive from the Companies.

3. Data transfer outside the European Economic Area

Within its contractual relations the Companies may transfer the Data in countries outside of the European Economic Area (EEA), including store them in databases managed by entities acting on behalf of the Marelli. Databases management and Data processing are bound to the purposes of the processing and are carried out according to applicable data protection law.

In case the Data are transferred outside of the EEA the Data Controllers will use any appropriate contractual measures to guarantee an adequate protection of the Data including – among the others – agreements based on the standard contractual clauses adopted by the EU Commission to rule the transfer of personal data outside of the EEA.

4. For how long will we store your data?

The Companies will retain your Personal Data only for as long as it is necessary for the purposes for which they were collected or for any other related legitimate purpose. If the Personal Data are processed for two different purposes, we will keep such data until the purpose with the longer-term ceases.

In particular, Joint Controllers have a general retention period of 10 years from the time of initial collection for personal data that is processed for our invoicing and accounting purposes in relation to our sales, save for the circumstances in which national applicable law provide for different retention requirements.

When the Companies no longer require your personal data for the above-mentioned purposes, will keep your personal data duly blocked and only for the period necessary for establishment, exercise, and defense of legal claims. Once this period has elapsed, the data will be erased or made anonymous in a permanent and non-reversible way.



5. Personal Data Protection Rights

Customers, subject to the existence of the legal basis for the request, have the right to ask each Joint Controller:

- the access to Personal Data, as provided for in Article 15 of the GDPR;
- the rectification or integration of Personal Data processed by the Companies deemed to be inaccurate, as provided for by Article 16 of the GDPR;
- the erasure of Personal Data for which Data Controllers have no longer any legal basis for processing, as provided for in Article 17 of the GDPR;
- the limitation of the way in which the Companies process Personal Data, if one of the cases provided for in Article 18 of the GDPR applies;
- the copy of the Personal Data you have provided to Data Controllers, in a structured, commonly used and machine-readable format and the transmission of such Data to another data controller (so-called portability), as provided for in Article 20 of the GDPR.

Right of objection: in addition to the rights listed above, Customers also have the right to object at any time on reasons relating to particular situation, to the processing of Personal Data relating to Customers by Data Controllers in pursuit of its legitimate interests. Request to object should be addressed to the following address: privacy@marelli.com or, in paper format, by registered letter with acknowledgement of receipt addressed to the Marelli's registered office.

If Customers exercise any of the aforementioned rights, it will be each Data Controllers responsibility to verify that Customers are entitled to exercise them, and you will be given a response usually within one month.

If Customers believe that the processing of Personal Data is in violation of the provisions of the applicable legislation on the protection of personal data, Customers have the right to lodge a complaint to the competent Data Protection Authority, or to take legal action.

The contact details of your local Data Protection Authority can be found here https://edpb.europa.eu/about-edpb/board/members_en.

6. Who can you contact if you have any questions?

The contact details of Marelli, as data controller, are as follows: Marelli Europe S.p.A. with registered office in viale Aldo Borletti 61/63 - 20011 Corbetta (MI).

The contact details of Marelli Holding, as data controller, are as follows: Marelli Holding Co Ltd. with registered office at 4-19 Miyahara-cho 2-chome, Kita-Ku, Saitama city, Saitama 331-8501 Japan.

If Customers have any questions regarding Data Controllers' processing of their Personal Data or wish to exercise the aforementioned rights, they may write an email to: privacy@marelli.com.

Marelli Europe S.p.A. Data Protection Officer (DPO), nominated also for all the Italian Marelli Affiliates, can be contacted using the following email address: dpo@marelli.com

7. Amendments

The Companies reserve the right to partly or fully amend the Privacy Policy, or simply to update its content (e.g. as a result of changes in applicable law).

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