

CONSENT TO TRANSFER PERSONAL DATA OUTSIDE OF SINGAPORE

Pirelli Asia PTE Ltd ("**we**") are seeking your consent to transfer your personal data outside of Singapore to Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. for the purposes of providing the initiative request by you.

Background

We may only transfer data about an individual ("**Personal Data**") outside of Singapore if it meets the requirements of section 26 of the Personal Data Protection Act 2012 ("**PDPA**"). We may satisfy the PDPA obligations if the individual whose Personal Data is to be transferred gives consent to the transfer after being given a 'reasonable summary in writing' of the extent to which the personal data to be transferred to that country or territory will be protected to a standard comparable to the protection under the PDPA.

The PDPA provides that organisations are subject to the nine relevant obligations under the PDPA, namely, the Consent, Purpose Limitation, Notification, Access and Correction, Accuracy, Protection, Retention, Transfer Limitation and Openness obligations.

Based on copies of Pirelli Tyre S.p.A. and Pirelli & C. S.p.A.'s 'Global Information Security Policy' and 'Global Personal Data Protection Policy' provided to us, we understand that Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. has developed comprehensive risk-based Information Protection policies, standards and guidelines for the control, processing, storage, transmission, communication and retention of its information. We provide a summary of Pirelli Tyre S.p.A. and Pirelli & C. S.p.A.' controls and procedures below.

Management Controls

Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. procure a top down approach to the protection of customer's Personal Data through a dedicated management system for global information risk management and compliance, including the development and maintenance of policies, standards and operational procedures for the Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. global business. The dedicated Group functions partner with local Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. businesses to manage information risks through the development and maintenance of processes and practices at the local level to implement the global policies. Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. employees who do not comply with these policies are subject to corrective action, up to termination of employment and where appropriate, criminal and civil proceedings under relevant laws.

Compliance with International best practice Standards

Pirelli Tyre S.p.A. and Pirelli & C. S.p.A.' global policies are aligned with international best practice and standards such as Information Security Systems (ISO/IEC 27001:2013).

Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. Corporate Level Information Protection Policies

Pirelli Tyre S.p.A. and Pirelli & C. S.p.A.' various policies, practices and standards are summarised below:

- **Global Information Security Policy:** governs the high-level responsibilities of information users, businesses and business partner groups of Pirelli Tyre S.p.A. and Pirelli & C. S.p.A.,

supplemented by additional policies, procedures, standards and guidelines that detail the requirements for protecting Pirelli Tyre S.p.A. and Pirelli & C. S.p.A.' corporate and client information. In particular, the 'Global Information Security Policy' and the related procedures provide a framework for proactively guarding against security breaches, unintentional or unauthorised destruction, accidental loss and unauthorised disclosure of information. Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. employees are responsible for safeguarding all non-public information. Individual and institutional customer information may only be used for the purposes authorised by Management.

- **Guidelines 'Classification of Corporate Data':** classifies information into categories of 'highly confidential', 'confidential', and other business information. The classification governs the security controls, transport and storage, erasure and destruction methods of the relevant information. Information classified 'highly confidential' or 'confidential' may be encrypted for storage or transit if the owner of the information determines the level of risk or exposure warrants additional protection. The 'Guidelines Classification of Corporate Data' are supported by standards relating to 'Information Classification and Handling' (establishes minimum controls in relation to access of information); 'Transport and Storage' (establishes minimum controls for secure transportation and storage); and 'Information Erasure and Destruction' (establishes controls to ensure the proper disposal of information in relation to its classification).
- **Access Restriction:** access to information of Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. or its customers is restricted to authorised users that have explicitly been given access to that information. The Access Restriction process is supported by standards relating to 'Access Control' (defines the minimum controls for identification of users); 'Authorisation and Certification' (governs management of access rights); and 'Privileged User Administration' (describes controls for granting, modifying and revoking access to information).
- **Electronic Communication:** The use of email, instant messaging, internet and network facilities is governed by various policies, procedures and controls to govern the use and monitoring of these activities to restrict the unauthorised use and access to Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. or customer information. These policies and procedures are supported by Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. controls relating to Internet Usage (specifies minimum controls required for access and use of internet via Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. infrastructure); and Portable Computing Devices (specifies minimum controls for use and protection of information on portable computing devices).
- **End User Operations:** information which may be accessed by Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. 's service providers are properly protected. All service providers engaged by Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. must comply with certain standards, including 'Information Security Incident Reporting' (specifies minimum controls for the timely reporting of Information Security Incidents); and 'Clear Desk' guidelines (requires users of Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. information to protect sensitive information at all times).

- **IT Operations:** Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. has safeguards in place to deal with internal and external threats, both deliberate and accidental. The overall objective of the policy is to ensure business continuity and minimise the impact of any security breach. The IT Operations Policy is supported by standards in relation to network security, network firewall, antivirus, information protection logging, monitoring, information security incident response, cloud computing and remote access. In addition, all software or hardware procured must operate in a manner that protects the confidentiality, integrity and availability of Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. 's technical environment.
- **Retention:** Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. has appropriate practices in place to ensure that information is not retained for longer than permitted under relevant local laws and regulations. Each Pirelli Tyre S.p.A. and Pirelli & C. S.p.A. business unit must retain records based on the Guidelines 'Classification of Corporate Data' and 'Global Personal Data Protection Policy', which refer to local regulatory requirements and must ensure that all records are retained in a secure environment with appropriate access controls related to the classification level of that information. Employees are instructed not to destroy records relating to a pending or threatened lawsuit, government investigation, third party subpoena or information that is required to be retained for legal purposes.

Please note that by transferring your information to Pirelli Tyre S.p.A. and Pirelli & C. S.p.A., we are in no way discharging our obligations under the PDPA. Please contact us if you require any assistance in relation to accessing or correcting your information held with Pirelli Tyre S.p.A. and Pirelli & C. S.p.A., or have any concerns over the accuracy of your Personal Data held by Pirelli Tyre S.p.A. and Pirelli & C. S.p.A..

For any additional information related your Personal Data please read the **Privacy Policy** <https://www.pirelli.com/tyres/en-sg/learn/privacy-policy>