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RINA GROUP POLICY

PRIVACY POLICY

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0	09/10/2025	VALRE	PSL	CL014

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The Policy outlines the general principles applicable to RINA Group companies acting as Joint Controllers in the processing of personal data, as well as the general safeguards adopted to comply with these principles.

GENERAL PRINCIPLES FOR PERSONAL DATA PROTECTION

The Policy identifies the general principles established by the RINA Group to protect personal data and ensure compliance with privacy regulations in all countries where the Group operates.

In this regard, RINA Group processes personal data of various categories of data subjects (e.g., employees, clients, suppliers) in accordance with the three core principles of data security:

1. **Data Confidentiality:** Information is accessible only to authorized individuals, preventing personal data from being disclosed or made available to those who are not entitled to access it;
2. **Data Integrity:** Personal data is accurate, complete, and has not been altered or modified in an unauthorized manner, whether intentionally or accidentally;
3. **Data Availability:** Information and systems are accessible and usable by authorized users when needed. This means systems must be resilient and capable of withstanding failures, attacks, and disruptions that could prevent their use.

RINA Group ensures compliance with these principles through the adoption of the following general principles of personal data processing:

- **Accountability:** Personal data processing is carried out in accordance with the principles listed below, and compliance is properly documented;
- **Privacy by Design and by Default:** Data protection aspects must be considered from the design, implementation, and configuration phases of all technologies used for processing operations;
- **Lawfulness, Fairness, and Transparency:** Personal data is collected and processed lawfully, fairly, and transparently with respect to the data subject;
- **Data Minimization:** Personal data is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed;
- **Accuracy:** Personal data is kept accurate and up to date, and reasonable measures are taken to promptly delete or rectify inaccurate or outdated data;
- **Purpose Limitation:** Personal data is collected and processed for specific, explicit, and legitimate purposes;
- **Storage Limitation (Data Retention):** Personal data is retained for no longer than necessary to achieve the purposes for which it was collected.

CORPORATE PRIVACY MANAGEMENT SYSTEM

To promote these principles and ensure maximum compliance with global privacy regulations, RINA Group has developed a set of documents, procedures, and instructions suitable for the proper management of personal data, considered a necessary asset for business operations.

This Policy applies to all RINA personnel in every country where the Group operates, as well as to its collaborators, who are required to comply with corporate procedures and report any violations through the whistleblowing platform available at whistleblowing.rina.org or by contacting the Data Protection Officer (DPO) at rina.dpo@rina.org.

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Carlo Luzzatto
Chief Executive Officer and General Manager