

## Draka Rewards Program Connect & Collect Privacy Policy

This Privacy Policy has been prepared to explain the methods and purposes for which Prysmian Netherlands (as defined in clause 11 below), in its capacity as data controller (hereinafter referred to as the "**Data Controller**"), processes your personal data on and through the website dedicated to the Draka Rewards Program Connect & Collect (the "**Program**") accessible at <https://www.connectcollect.nl/> (hereinafter referred to as the "**Website**"). The website is administered by Snipp Interactive Inc., 6708 Tulip Hill Terrace, Bethesda, MD, 20816, USA (the "**Administrator**").

Please note that this Policy shall apply to anyone who navigates and/or uses the Website, or otherwise interacts with the contents and services accessible through the Website (hereinafter the "**User**").

The processing of personal data of the Users will take place in full compliance with the applicable data protection legislation, including the Regulation (EU) 2016/679 (the "**GDPR**").

### 1. Redirect to other websites

The Website incorporates links which allow you to connect to other websites run by the Data Controller <https://nl.prysmian.com/> and by third parties. Prysmian Netherlands assumes no responsibility regarding the processing of personal data which may take place through and/or in connection with third-parties' websites. The Privacy Policy of the Data Controller's website is accessible [here](#).

Therefore, each User who accesses such web pages and/or social platforms through the Website must carefully read the relevant privacy policies in order to better understand how their personal data will be processed by the third parties which, as autonomous controllers, will provide and manage such websites.

### 2. Categories of personal data collected

#### (A) *Data automatically collected*

To get more detailed information, please refer to the applicable Privacy Policy of the Administrator accessible here: <https://www.snipp.com/privacy-policy>

#### (B) *Personal data provided directly from User*

There are few sections of the Website (e.g. registration form) which are aimed to collect only those personal data which is necessary for participation in the Program. It remains understood that, in this case, the Data Controller must collect the data provided by the User in order to fulfil its obligations to the User within the Program. Accordingly, if the User prefers that the Data Controller does not collect his/her personal data, he or she can choose not to participate in the Program.

In any event, the Users will always be free, after having read this Policy in order to understand in detail how and for which purposes their personal data will be processed by Prysmian Netherlands, to share his/her own data by filling out the specific forms available on the Website to be able to participate in the Program.

The data includes the following information:

- Your company name, if applicable

- Company location
- Postal code
- First Name
- Last Name
- Email address
- Phone number
- Preferred Language (English/Dutch)
- Agree to the T&Cs and Privacy Policy

### 3. Purposes of the processing

The Website has been designed with the main goal of providing information – and therefore as an interactive window – regarding the activities, products and services of Prysmian Netherlands, including without limitation for the purposes of the Program.

In any case, according to the principles set forth by the GDPR, the Website is also set to minimize the collection of personal data, as well as to exclude the processing of such data in all cases when the purposes described hereunder can be achieved with different means and/or by anonymous data.

Your personal data will be processed by Prysmian Netherlands for the sole purposes of:

- allowing participation in the Program
- allowing processing of submitted invoices in order to accumulate the rewarding coins within the Program
- allowing an appropriate navigation on the Website;
- allowing the Users to better explore and get more information regarding the activities, services and products offered by Prysmian Netherlands;
- answering and fulfilling the Users' requests;
- to comply with obligations provided for by applicable laws and/or requests or orders made by competent authorities;
- delivering promotional newsletter regarding the products and services of Prysmian Netherlands.

Should the data be collected in the future also for purposes other than those described above, it will be duty of the Data Controller, on one hand, to provide adequate information to the User relating to such new purposes in order to enable transparency and user awareness and, on the other hand, ensure that that a valid legal basis (such as the User's consent) exists, where needed, to undertake the relevant processing.

### 4. Legal basis of the processing

The provision of personal data by the User - unless otherwise noted - is optional, but it must be highlighted that in case of refusal to make some data available to Prysmian Netherlands, it could be impossible for the User to participate in the Program and for the Data Controller to fulfill the User's request or provide certain specific services within the purposes of the Program.

The processing activities listed above do not require the acquisition of the User's consent, as they are based on different legal bases, i.e. the need to perform and provide the services which have been directly requested by the User and the need to ensure compliance with a legal obligations applicable to the Data Controller.

On the contrary, sending promotional newsletters requires the User's registration, Prysmian Netherlands will not be able to deliver this kind of communication in absence of the User's prior specific consent.

## 5. Methods of the processing and data security

The personal data are collected and processed lawfully and fairly, for the above purposes and in accordance with the fundamental principles established by the applicable legislation.

Processing operations may take place both manually and electronically, or by information technology tools, always under technical and organizational measures that ensure the security and confidentiality of the data, especially in view of reducing the risks of accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to the personal data or, more generally, processing that is not compliant with the purposes of the collection.

The processing will be carried out under the authority of the Data Controller only by those subjects who have been duly authorized to access and process the data in accordance with the instructions provided for by the Data Controller and the applicable data protection laws and regulations.

## 6. Communications to third parties

The personal data collected through the Website will be shared with the Participating Wholesale Partners as defined in the Draka Rewards Program Connect & Collect Terms and Conditions.

Should the data be made available by the Data Controller to third-party suppliers or partners (such as service providers, mail carriers, hosting providers, IT companies, communication agencies) in order to enable them to perform specific services connected to or necessary for the fulfilment of the purposes listed above, it will be responsibility of the Data Controller to appoint such third parties as data processor by virtue of their capacity, experience and reliability and to provide them with specific instructions regarding the security of the data. The updated list of appointed data processors can be accessed at any time by sending a written request to the Data Controller, as specified below.

It remains understood that the Users' personal data must be communicated to third parties, such as public or judicial authorities, to comply with binding orders and request, as well as with applicable legal provisions.

## 7. Data retention

Personal data collected by the Website will be kept in a format that allows User's identification for no longer than necessary to fulfill the purposes for which the data have been originally collected and, in any case, within the time limits set forth by applicable laws and regulations, as well as to enforce or protect the rights of the Data Controller (consistent with the retention periods and statutes of limitations provided for by the law), where necessary.

When no longer necessary in accordance with the above, the data will be cancelled or anonymized.

## 8. Cookies (cross-reference)

To get more detailed information regarding the installation and use of cookies by this Website, please refer to the applicable Privacy Policy of the Administrator accessible here: <https://www.snipp.com/privacy-policy>

## 9. Transfer of data abroad

Given the international nature of the Data Controller's business activities, the data will be transferred and so processed abroad, still for the sole purposes described above, by the Administrator and the companies belonging to the Prysmian group of companies which are established both inside and outside the territory of the European Union.

In all cases when the data will be transferred to non-EU countries, the relevant transmission will be subject to specific data protection guarantees, as required by the law, e.g. through the adoption of Standard Model Clauses as approved by the European Commission, or other equivalent safeguards.

This website uses cookies that allow the transfer of personal data abroad, in particular to the USA. Personal data will be transferred and processed using suitable guarantees provided for by the GDPR, such as the stipulation of Standard Contractual Clauses, signed with our providers.

## 10. Data subjects' rights

The User can at any time exercise his/her rights, including:

- accessing his/her personal data, obtaining evidence of the purposes pursued by the Data Controller, the categories of data involved, the recipients to whom they may be disclosed, the applicable storage period, the existence of automated decision-making processes;
- having incorrect personal data referred to him/her rectified without delay;
- having his data erased in the cases provided for by the law;
- obtaining restrictions to processing, where possible;
- requesting portability of the data provided to the Data Controller, i.e. receiving them in a structured, commonly used and machine-readable format, also for transmitting such data to another controller, without any hindrance by Prysmian Netherlands, in all situations where it is required by the law in force;
- lodge a complaint to the competent Supervisory Authority (in the Netherlands, Dutch Data Protection Authority).

To exercise these rights, or for any further information and/or clarifications, please write to [privacy@prysmian.com](mailto:privacy@prysmian.com).

## 11. Data Controller

The Data Controller is Prysmian Netherlands B.V. and its affiliated companies in the Netherlands (Prysmian Netherlands), which was established in accordance with the laws of the Netherlands and has its commercial headquarters at Schieweg 9, 2627 AN, Delft.

The Data Controller's Data Protection Officer may be contacted by writing to [privacy@prysmian.com](mailto:privacy@prysmian.com).

## 12. Policy updating

The date when the last version of this policy has been uploaded: 30/06/2024.