



RINA GROUP PRIVACY BINDING CORPORATE RULES SUMMARY Rev. 0 - 24th april 2018

(according to European General Data Protection Regulation 2016/679)

Binding Corporate Rules (BCRs) are aimed to allow multinational companies to transfer personal data to their affiliates located outside of the European Union.

This Privacy Binding Corporate Rules define, within the organization of RINA Group, how to deal with data protection regulation requirements, with specific reference to transfer of personal data between all the companies belonging to the Group.

1. Structure and contact details of RINA Group

RINA Group provides certification, testing, inspection, and consulting services across the Energy, Marine, Certification, Transport & Infrastructure and Industry sectors.

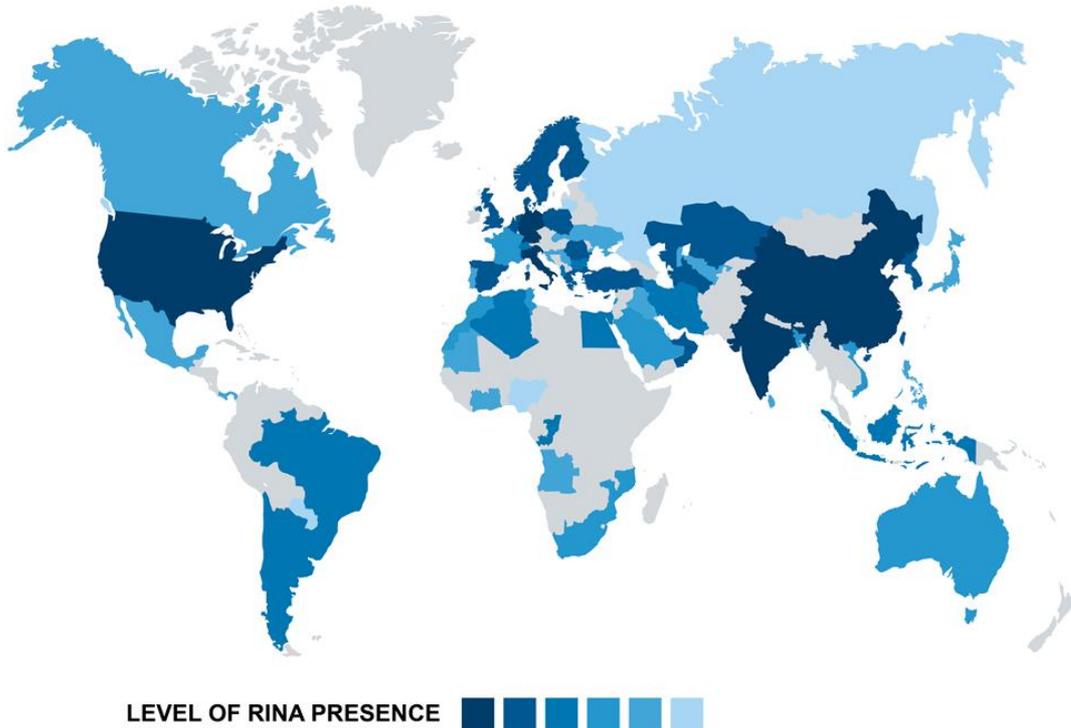
RINA Group has about 3,700 employees and 170 offices in 65 countries worldwide.

The holding company of the Group is RINA S.p.A., with head office in Genoa (Italy), via Corsica 12.

RINA S.p.A. appointed a single Data Protection Officer (“DPO”) according to art. 37 of the European Regulation 2016/679 (“GDPR”), which is in charge for the data protection compliance of the whole RINA Group companies.

RINA DPO is easily reachable by e-mail at the following email address: rina.dpo@rina.org.

Contact details of the legal entities in each Country can be found on the website at the following <https://www.rina.org/en/contacts>.



2. Binding nature of the Rules

These Rules apply to all personal information relevant to employees, clients, suppliers and other individuals, which are collected and processed by any of the company belonging to RINA Group.

The Rules are a general privacy procedure of the RINA Group based on the European Regulation and shall be applied by and are binding for each company belonging to the Group.

All RINA Group companies shall adopt these Rules according to the local applicable laws. As a consequence, they are bound to a legal duty to comply with the Rules in order to provide an adequate level of protection to the personal data processed.

Data subjects worldwide will be able to enforce such Rules irrespective of the fact that data processing have been made by a European company or by an extra-UE company of the Group.



If a Country provides different regulations of personal data protection, the involved RINA Group company will apply the higher standard.

Each EU based RINA Group company undertake, in its capacity as data controller and/or processor, to be liable for any breaches of the Rules by any company concerned not established in the Union, to the extent that it is proved that such non-EU company is not responsible for the event/breach giving rise to the damage or that no breach took place.

3. General principles relevant to data processing

All RINA Group personnel will process personal data according to the following principles.

- Lawfulness, fairness and transparency: personal data will be processed in a lawful, fair and transparent manner, according to the GDPR provisions. Transparent information is given to data subjects about the data processing that will be done.
- Purpose limitations: personal data will be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Data can only be collected for specific processing purposes that the subject has been made aware of and no other, without further consent.
- Data minimization: personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed; no more than the minimum amount of data is kept for specific processing.
- Accuracy: personal data must be accurate and, where necessary, kept up to date.
- Storage limitations: personal data must be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

Personal data no longer required for processing should be removed or stored with strongly limited access to them, in order to allow Data Controller to exercise or defend a legal claim.



- Integrity and confidentiality: personal data must be processed in a manner that ensures their security, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

4. The data subject rights, the right to complaint and the complaint procedure

Any data subject has fundamental rights relevant to his/her personal data processing:

- The right to access to his/her personal data processed by RINA Group companies;
- The right to have inaccurate or incomplete personal data to be corrected, updated, deleted or blocked;
- The right to request not to be subject to a decision based solely on automated processing, including profiling, which produces legal effect on him/her or significantly affect him/her;
- The right to receive his/her personal data in a structured, commonly used and machine-readable format and the right to transmit such data to another controller;
- The right to restrict the data processing in case of unlawful processing.

If any data subject has doubts, questions or complaint regarding the compliance of the data processing to the Rules, he/she can contact RINA Data Protection Officer (rina.dpo@rina.org) who will answer to the questions and try to solve the issue.

DPO will review the issue and keep in contact with the claimant data subject, with the aim to find a positive solution possibly within 15 business days from the notice. If it requires a longer time due to the nature or complexity of the request, data subject will be informed accordingly and keep updated by the DPO.

Finally, if data subject is not satisfied by the solution proposed, he/she can:

- File a complaint before the Data Protection authority
- File a complaint before a competent court (of the EU State where he/she resides or work or where the alleged breach occurred)



Data subject may also ask to the competent Court for compensation in the event of an alleged breach of the Rules.