



PRIVACY POLICY

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Alpha Trading SpA is a trading company that deals exclusively with the marketing of petroleum products.

It does not produce or refine petroleum products, but purchases them directly from producers and suppliers to resell to end customers, which include refiners, retailers, and large industrial consumers.

The company has its own depots, where it stores biodiesel, diesel fuel, and pure bitumen. It also produces bituminous emulsions and modified bitumen, always starting from refined raw materials, never from crude ones. It also manages the marketing and delivery of bunkers for cargo and passenger ships.

Its registered office is in Milan and it has three local offices in Genoa, Carbonara Scrivia (AL), and Solbiate Olona (VA); it operates on the domestic, EU, and non-EU markets.

It has 9 special prosecutors, a Board of Auditors, composed of 5 members, (1 President and 4 Auditors, 2 of whom are Acting and 2 Deputy).

Further information (Corporate Governance, Organizational Chart, Sustainability Report, etc.) can be found on the company's institutional website (<https://www.alphatrading.it/>).

Alpha Trading SpA is aware of the strategic importance of a proper personal data protection policy, not only to meet specific regulatory obligations but above all to safeguard the relationship of trust with its "data subjects," which underpins all the activities, services, and collaborations that Alpha Trading SpA has and offers to its stakeholders (including institutional ones).

Alpha Trading SpA places equal emphasis on protecting the personal data of its employees and their families.

In order to protect the personal data entrusted to it, Alpha Trading SpA has adopted this Personal Data Protection Policy and adheres to the principles set forth therein. Alpha Trading SpA intends to disseminate, comply with, and ensure compliance with this policy by its employees and collaborators.

That being said, Alpha Trading SpA undertakes to:

- communicate and disseminate its policy regarding the protection of personal data;
- listen and pay attention to all interested parties – institutions, customers, employees, collaborators, suppliers, etc. – and take due account of their requests regarding the processing of personal data, providing prompt feedback;
- process personal data:
 - in a lawful, correct and transparent manner in line with constitutional principles and current legislation;
 - only for the time strictly necessary to pursue the intended purposes, including those to comply with legal obligations;
- collect personal data limited to those essential for the processing in progress (relevant and limited personal data);

- process personal data in accordance with the principles of institutional transparency for the sole purposes identified for each individual processing operation;
- adopt processes for updating and rectifying the personal data processed to ensure that they are, as far as possible, correct and up-to-date;
- store and protect the personal data in its possession using the best preservation techniques available;
- ensure the continuous updating of personal data protection measures;
- Provide training and information to its staff, based on their roles, regarding the principles of lawfulness and fairness with which the processing of personal data must comply, as well as compliance with the safeguards adopted, promoting the development of responsibility and awareness throughout the organization regarding personal data;
- carry out constant monitoring of the information system and its management and development resources to verify compliance with this Personal Data Protection Policy;
- ensure compliance with the legislative and regulatory provisions applicable to the protection of personal data, updating the management of personal data protection where necessary;
- prevent and/or minimize, in accordance with available company resources, the impact of potential violations or unlawful and/or harmful processing of personal data, whether accidental or malicious;
- ensure the same levels of protection for data processed in any manner (automatic or manual, computerized or paper-based).

Alpha Trading SpA is committed to ensuring that its Personal Data Protection Policy, and all its consequences, is understood, implemented, and supported by all internal and external stakeholders involved in company activities.

This Personal Data Protection Policy will be available on the website so that all Alpha Trading SpA stakeholders can view it; specific initiatives will be implemented for internal staff and collaborators to increase and ensure the dissemination of this Policy.