

THE EPTA REWARDS & RECOGNITION PROGRAMME PRIVACY NOTICE

EPTA S.p.A., VAT n. IT 04160730968, with its registered Office in Via Mecenate, 86 - 20138 Milano – Italy, (“**Epta**”) as joint data controller together with each of the other Epta Group companies listed in the [Annex 1](#) below, with regard to data processing of the employees of each of the latter (each of them individually, together with EPTA, referred hereinafter to as “**we**”, “**us**” or the “**Company/ies**”, or the “**Data Controller/s**”), collect and Process a wide range of personal information, Epta involvement being limited as to sponsorship and project management, inclusive of budget-related allocation and decision making for the Project (as defined below).

This Privacy Notice describes our practices with respect to the Processing of your personal data in the context of the Epta Rewards & Recognition Programme (the “**Project**”), with a focus on the Empuls platform (the “**Platform**”) that you will be required to use in case you voluntarily decide not to object to participate to the Project. The Project consists on a process of incentivizing feedback and acknowledging our employees for their contributions and achievements through a variety of rewards and recognition programs, such as monetary incentives, non-monetary incentives, peer recognition, manager recognition, and more via the Platform.

Related Processing activities concerning employees are carried out using the Platform, a technology system for the management of the feedback exchanged, approval of the points granted and for benefits from the non-monetary voucher(s) to be spent in different virtual and/or physical stores after having received a feedback and this having been successfully approved in compliance with the validation process described in the Policy.

This Privacy Notice does not form part of any contract of employment or other contract to provide services.

It is important that you read this Privacy Notice so that you are aware of how and why we Process Personal Data using the Platform and what your rights are in relation to such Processing.

This Privacy Notice provides you with the relevant information about the Processing of your Personal Data using the Platform, as completed by *ad hoc privacy notice(s)* applying in relation to specific requirements under local applicable law(s), as per [Annex 2](#) to this Notice.

Please note that laws vary from jurisdiction to jurisdiction and sections of this Privacy Notice may be dedicated to specific jurisdictions and therefore may not apply to you, as indicated in the applicable [Annex 2](#).

Participation to the Project is entirely voluntary (please see below as to your right to object, fully or partially, now or at any future time), your objection to participate will bear no consequence apart the non-inclusion in the Project, and we will never use the feedback received (or not received) or your decision not to participate in the Project in order to evaluate or to discriminate you.

I. Categories of Personal Data

When we refer to “**Personal Data**” we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a specific individual. It does not include anonymous or deidentified information that is Processed in a form that is not capable of being associated with or reasonably linked to you.

We Process the following Personal Data about you:

- employee number assigned by its company, email address, first and last name, gender, date of birth, nationality, legal employer identification code, legal employer company name, hiring date,

probationary period expiry date, employment termination date, contract type, job category (between manager, blue collar or white collar), country and city of work location and associated code, department and business unit code and location, job code, job name, job function, manager flag (Y/N), cost centre code and description, manager number assigned by the employer, any other personal data voluntarily included in the feedback exchanged, personal mobile phone in the case of blue collars, instrumental to sign-in within the Platform,

some of such categories being Processed on an aggregated basis in order to check the correct working of the Project.

It is expected that the visibility of the feedback is limited to the feedback receiver, the feedback sender, and the stakeholders involved in the validation process (e.g., Line Manager and HR business partner), with no dissemination within the Platform. Should in future public recognition (meaning the visibility of the feedback received and points granted to all the participants to the Project as set within the Platform) be shown, you, as feedbacks' receiver – in addition to your general right to object against the whole Processing, i.e., inclusion in the Project - will be able, at any time, to oppose only to such public visibility, by sending an email at any of the email addresses indicated in [Annex 1](#) below, while continuing nevertheless to participate in the Project.

II. Processing Purposes

We Process your Personal Data only to the extent permitted or required under applicable law, for the purposes of having a common platform and secure place where it is possible to manage all the aspects related to feedback granted from an employee to another, from the exchanging phase, to the approval flow, consumption of the points, and spending of the voucher or recognition so obtained and approved.

III. Legal Grounds for the Processing of Your Personal Data

The identified legal basis for Processing is our legitimate interest to (a) carry out the action plan emerged by the Great Place to Work, in order to increase the level of satisfaction of employees, (b) to give effectiveness and to follow up on the results that the employees themselves expressed via the survey, (c) to develop and promote a culture of feedback & recognition, which has the characteristic of being (also) horizontal, therefore beyond the purely salary and bonus aspect for the achievement of professional objectives. The same legitimate interest is the legal basis for possible future dissemination (meaning visibility), within the Platform to all the participants to the Project, only of feedbacks received and points granted to any participant as set within the Platform, beyond the Line Manager of the feedback's receiver, the HR business partner and the feedback's sender, the feedbacks' receiver having in such event the right to oppose at any time to such public visibility by sending an email at any of the email addresses indicated in [Annex 1](#) below, while continuing nevertheless to participate in the Project if desired.

The legal basis of the Processing necessary to keep track of the vouchers obtained and spent for the purposes of tax deduction is the legal obligation, following from tax-related laws.

Under some local privacy and data protection laws there could be different legal grounds on which we can rely to Process the Personal Data of employees located in that region, as well as additional requirements to comply with. Please rely on the information set out in [Annex 2](#) for the relevant legal grounds (if any) and additional requirements which may apply in the country in which you are employed or engaged.

IV. Data Transfers, Recipients, and Legal Ground for Transfers

1. Categories of Recipients of your Personal Data

The Project provides at this stage the exchange of feedbacks only among the employees and internally in each single company in scope, as per [Annex 1](#), with no possibility of cross-country exchanges and visibility. It is expected that, during the course of the Project, it is extended the possibility to exchange feedbacks also

among the employees of different companies of the Epta Group, in which case we will duly inform you in advance in this regard.

Please note that Epta S.p.A. will have full visibility of all feedbacks exchanged and Personal Data included within the Platform, for project management and allocation of budget purposes.

The Personal Data will also be transferred to the provider of the Platform, as better explained in the following paragraph.

Except for visibility of the feedback received and points granted to all the participants, your Personal Data will only be made accessible to those persons within the Data Controllers who may need it in order to carry out their duties. These persons will be under an appropriate statutory obligation of confidentiality and properly instructed in order to avoid loss, destruction, unauthorised access or unauthorised Processing of the data.

Furthermore, the data may be used by third party companies, duly appointed as data processors, who carry out instrumental activities on behalf of the Data Controllers, for the pursuit of the purposes described above, such as IT service companies (management and maintenance of IT systems, data entry activities, etc.), including, *inter alia*, NREACH ONLINE SERVICES INC as supplier of the Platform.

Finally, your Personal Data may be disclosed to Public Authorities, where required by applicable legislation, including those of a fiscal or administrative nature.

2. Cross-Border Data Transfers

We may transfer your Personal Data to members of our Group and service providers located outside of the country where you are located. Should we transfer your Personal Data internationally, inclusive outside the European Economic Area (EEA) - also in the case in future to Companies of the EPTA Group other than Epta S.p.A., after informing you and making the list of related countries available to you - we will take the steps required to ensure that your Personal Data are treated securely, lawfully (by making use of an *ad hoc intercompany Personal Data Transfer Agreement* including *EU Standard Contractual Clauses* for data transfers between the companies of Epta Group, or adequacy decisions of the EU Commission where applicable, or any other appropriate legal means provided for under CHAPTER V of GDPR), and in the manner we describe in this Privacy Notice. Please note that laws vary from jurisdiction to jurisdiction, so the privacy laws applicable to the place(s) where your Personal Data are transferred to, stored, used, or anyhow Processed in, may be different from the privacy laws applicable to the place where you are a resident.

We will also transfer your Personal Data, without prejudice of your right to preliminarily object to the Processing before it starts within 5 days from the receipt of this Privacy Notice (as provided in paragraph VI below), namely to NREACH ONLINE SERVICES INC, a Delaware Corporation having its registered office at 8 The Green, STE A, Dover, Kent – 19901, Delaware, USA and its Corporate office at 303 Twin Dolphin Drive, FL 600 #80, Redwood City, California 94065, United States, appointed as Data Processor, and registered to the Data Privacy Framework USA-UE, based on the related EU Commission Adequacy Decision of July 10, 2023.

We have in place appropriate technical and organizational measures to protect the Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, and which provide a level of security appropriate to the risk represented by the Processing and the nature of the Personal Data to be protected. If you wish to see the details of these safeguards, please contact us using the contact information set out in [Annex 1](#).

V. Retention Periods

We will not keep Personal Data for longer than necessary to accomplish the purposes for which the Personal Data was collected using the Platform. We will keep your Personal Data (i) in the Platform for the duration of your participation to the Project and for the subsequent month in order to ensure the appropriate internal reporting, and (ii) in our records for 5 years, to handle the payroll and tax-related aspects related to the

vouchers so obtained, unless a longer Processing period is necessary for the establishment, exercise or defence of legal claims, according with local applicable laws and/or as required by Public Authorities.

VI. Your Privacy Rights

For Staff Members Located in the European Economic Area: under the EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the Processing of personal data (GDPR) and corresponding local data protection law, you have the following rights:

- **Right to Access:** you have the right to know if we are Processing your Personal Data and to a copy of your Personal Data upon request.
- **Right to Rectification:** you have the right to correct or update your Personal Data.
- **Right to Erasure:** you have the right to ask us to delete your Personal Data.
- **Rights to Object:** you have the right to object, at any time and with no cost, to the whole Processing of your Personal Data, or in part only to the visibility to all the participants to the Project of the feedback received and points granted, as set within the Platform. In case you object within 5 days from the receipt of this Notice, we will not even start transferring your Personal Data within the Platform or Process them anyhow hereunder. If you do not exercise this opt-out mechanism, it will be considered as acceptance, without prejudice of your right to object also afterwards at any time and with no cost.
- **Rights to Restrict, and to Portability:** you have the right to ask us to restrict Processing of your Personal Data, or to request portability of your Personal Data (if technically feasible).

You can enforce your abovementioned rights by sending an email at any of the email addresses indicated in [Annex 1](#) below.

Right to Complain: you have also the right to lodge a complaint with the competent data protection authority.

Please note that these rights may vary under the applicable local data protection laws. If you would like more information about the rights in your jurisdiction, please rely on information set out as *per* [Annex 2](#).

VII. Changes to this Privacy Notice

This Privacy Notice is subject to change at any time. If we decide to make material changes to this Privacy Notice we will inform you and make any updated copy available to you.

VIII. How to Contact Us

Should you have questions concerning this Privacy Notice or should you want to exercise the rights listed at par. VI above, please contact the addresses listed in [Annex 1](#) for the employing or contracting entity named in your employment or services contract.

Date: May 12, 2025.

ANNEX 1
Companies & Contact Information

Entity	Country	Address	Contacts <i>If you have any questions or requests in connection with this Privacy Notice or other privacy-related matters please contact the below email addresses or alternatively, you may send an email to compliance@eptarefrigeration.com</i>
EPTA S.p.A.	ITALY	Via Mecenate, 86, Milan	Edoardo Pasqualini, HR Business Partner, edoardo.pasqualini@eptarefrigeration.com ; or Epta Group Corporate and Legal Affairs: compliance@eptarefrigeration.com
EPTA Refrigeration Philippines, Inc.	PHILIPPINES	Lot 2 West Service Road, Barangay Buli Muntinlupa City, Philippines 1771	Maricel Catoy, Country HR Business Partner, maricel.catoy@epta-asiapacific.com .
EPTA UK Limited	UK	Highfield Works, Highfield Road, Idle, Bradford BD10 8RU	David Wormald, Country HR SR Business Partner, david.wormald@epta-uk.com
KYSOR WARREN EPTA US CORP	USA	1 Corporate Ridge Parkway, Columbus, GA. 31907	Lilina Lund, Regional HR Director, lilina.lund@kysorwarren.com

ANNEX 2
Local requirements

For Staff Members located in the State of California within the United States of America

In the preceding 12 months, we have collected personal identifiers and characteristics of protected classifications under California or United States' federal law. For details about the precise data points we collect and the categories of such collection, please see the information listed in Section I, for details about the purposes, please refer to Section III, and for details about the recipients, please refer to Section IV.1. Furthermore, we may also share your personal information collected in connection with the Project with data processor and other service providers, consultants, affiliates, integration partners, lawyers, data aggregators, professional advisors, operating platforms, and government entities on an as-needed basis. We may also disclose aggregated or de-identified information, which cannot reasonably be used to identify you. We process, maintain, and use this information only in a de-identified fashion and will not attempt to re-identify such information except as permitted by law.

You may have certain rights under California law. This may include a right to access, correct, or delete data, subject to applicable exceptions. Any request to exercise one of these rights will be assessed by Epta on a case-by-case basis. For example, we may retain your personal data to comply with legal obligations. To exercise your rights, contact us as described at the end of this notice. You may designate an authorized agent to exercise privacy rights on your behalf by providing the authorized agent signed permission to submit the request on your behalf. If an authorized agent submits a request on your behalf, we may need to contact you to verify your identity and protect the security of your personal information. If you are an authorized agent seeking to make a rights request, please contact us at any of the email addresses indicated in Annex 1. We will not discriminate or retaliate against you because you have exercised your rights under California law. If you choose not to disclose certain personal information, this may limit our ability to perform certain activities in connection with the Project.

Under California law we are required to tell Californians if we “sell” or “share” information as that term is defined by applicable law. Sell is defined under the law as disclosing personal information to a third party for monetary or other valuable consideration. Share is specifically defined under the law as well. Sharing means sharing personal information with a third party for cross-context behavioral advertising. California employees, we do not do “sell” or “share” employee data based on our understanding of those terms.

Data Retention. The length of time we retain your personal information depends on the status of our relationship with you and the requirements of applicable law. We will retain your personal information for as long as your employment or engagement with us lasts and for a certain period of time thereafter, after which point it will be deleted or archived in accordance with applicable law. To determine that period, we take into account a number of factors, including our legal and regulatory obligations (such as financial reporting obligations and equal opportunity or anti-discrimination reporting obligations) and whether we may need to retain personal information to resolve disputes, make or defend legal claims, conduct audits, pursue legitimate business purposes, and/or enforce our agreements.

Updates; Questions. From time to time, we may update this notice. Each version of this Notice is identified by its effective date. If we make changes to this, we will notify you by revising the date at the top of this Notice. If we make material changes, we will provide you with additional notice. If you have questions about this notice, please contact any of the email addresses indicated in [Annex 1](#).

For Staff Members employed by EPTA UK Limited

Cross-Border Data Transfers. We may transfer your Personal Data to members of our Group and service providers located outside of the UK. Where we transfer Personal Data to entities located in jurisdictions recognized by the UK Government as providing an adequate level of data protection (such as countries in the EEA), we rely on that adequacy decision. Should we transfer Personal Data to a country that is not recognized as adequate by the UK Government, we safeguard this data through an *ad hoc intercompany Personal Data Transfer Agreement*.

We will transfer your Personal Data to our service provider NREACH ONLINE SERVICES INC, a Delaware Corporation having its registered office at 8 The Green, STE A, Dover, Kent – 19901, Delaware, USA and its Corporate office at 303 Twin Dolphin Drive, FL 600 #80, Redwood City, California 94065, USA, pursuant to its registration under the UK Extension to the EU-US Data Privacy Framework. More information on our processor's registration can be accessed at the following URL: <https://www.dataprivacyframework.gov/list>.

If you wish to see the details of these safeguards, please contact us using the contact information set out in [Annex 1](#).

For Staff Members who are Philippine citizens or residents, or where Personal Data is collected, held or processed in the Philippines

Legal Grounds for the Processing of your Personal Data. In addition to the legal grounds stated in the Privacy Notice, if you are a Philippine citizen or resident, or where your Personal Data is collected, held or processed in the Philippines, your informed consent shall be obtained for the processing of the following categories of personal data: gender, date of birth, nationality.

Your Privacy Rights. In addition to the rights identified in Section VI of the Privacy Notice, a Philippine data subject shall have the right to lodge a complaint before the National Privacy Commission of the Philippines, and to be indemnified for any damages sustained due to any inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of your Personal Data.