



**P01 INFORMATION SECURITY AND PERSONAL DATA
PROTECTION POLICY**

REV. N. 00
of 29/12/2025
Public

INFORMATION SECURITY AND PERSONAL DATA PROTECTION POLICY

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1 INFORMATION SECURITY AND PERSONAL DATA PROTECTION POLICY

Fornovo Gas S.p.A. is aware that its information assets are of absolute strategic importance and represent an important corporate asset to be protected.

Furthermore, it considers it essential to guarantee the protection of individuals with regard to their personal data, committing itself to processing such data in full compliance with the provisions in force on the subject and following the best practices currently available.

For this reason, Fornovo Gas S.p.A. has approved this information security policy, having as a reference national and international standards, such as ISO IEC 27001:2022, as well as the related mandatory reference regulations, such as the European Data Protection Regulation and EU Directive 2022/2555 ("NIS2").

Information security is understood as the maintenance of:

- confidentiality, i.e. guaranteeing access to information only to authorized subjects;
- integrity, i.e. safeguarding the accuracy and completeness of the information and the methods of processing;
- availability, i.e. ensuring access to information and associated assets to authorised parties who request it without delay.

In addition, the protection of personal data is also understood as:

- lawfulness, fairness and transparency of the processing towards the data subject;
- limitation of the purpose of the processing;
- Data minimisation: i.e. the data must be adequate, relevant and limited to what is necessary in relation to the purposes of the processing;
- accuracy and updating of data, including the timely deletion of data that are inaccurate with respect to the purposes of the processing;
- storage limitation.

Fornovo Gas S.p.A. It is committed to ensuring the confidentiality, integrity and availability of information not only of its own company, but also of its customers, employees and stakeholders in general, applying the principles of Need to Know, Least Privilege, Risk-Based Thinking and Security by Design & By Default as corporate culture.

In view of this commitment and on the basis of these principles, Fornovo Gas S.p.A. has implemented a Management System for the Security of Information and Personal Data, as a control mechanism that, through organizational, physical, technological and personnel management measures, allow Management to ensure that the security of information (including personal data) is the result of sustainable management rather than that of mere coincidence and individual effort.

In fact, Fornovo Gas S.p.A. believes that the security that can only be achieved through technical measures is limited and must be supported by adequate information security management procedures, constant monitoring of the System, risk-oriented and always aimed at improvement, as well as training and raising awareness of the actors involved.

Fornovo Gas S.p.A. is in fact aware that the security of information and personal data is the tangible result of the responsible and competent participation and commitment of everyone: employees, customers and suppliers.

The objectives for information security and personal data protection of Fornovo Gas S.p.A. are:

- Guarantee confidentiality, integrity and availability of information (business and personal) of its employees, suppliers and customers, ensuring that it is managed in accordance with regulatory obligations - national and international -, contractual and standards to which the company adheres.
- Integrate the requirements of the management system for the security of information and personal data within the company processes, keeping the management system for information security always updated, monitored and aimed at continuous improvement.
- Assign roles and responsibilities to qualified and competent personnel, free of conflicts of interest and subordination, in order to outline a clear management of the security of information and personal data in terms of: governance, incident management - including Data Breaches -, crisis management and business continuity.
- Be receptive to the risks and opportunities of the external and internal context, to promote an up-to-date understanding of the possible impacts that may fall on the information managed by the company and encourage a prompt response.
- To train and raise awareness among employees on information security and personal data protection, on the management system implemented and related policies, procedures and regulations, on potential risks – increasingly frequent and complex – and how to prevent them.
- Communicate with the competent authorities and interested parties the information security events and personal data that may have a significant impact on them, according to contractual agreements and national and international regulations, and keep the records necessary for the reconstruction of the events and their causes.
- Adopt appropriate measures – physical and technological – for prevention, and prepare response plans for the management of crises, incidents and data breaches or potential such; ensuring suitable measures to preserve the continuity of the security of information and personal data.
- Ensure that the security of information and personal data is also maintained by its supply chain and by the technologies that Fornovo Gas S.p.A. uses, sharing with its collaborators the security standards that Fornovo Gas S.p.A. expects within the collaboration relationship and clearly and transparently dividing the responsibilities of the parties for the security of the information exchanged in the contractual collaboration relationship, also with reference to current legislation.
- Prevent the loss of copyright by monitoring the software used, whether it can be used online or under license, also in consideration of the introduction of artificial intelligence.



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- Evaluate its management system for the security of information and personal data also through independent and qualified bodies.

Fornovo Gas S.p.A. adopts this information security policy and undertakes to pursue its objectives.

The policy is reviewed by Fornovo Gas S.p.A. in the event of changes that may be significant and incidents on its information security and personal data protection objectives.

The Management

2 VALIDITY

This corporate document is effective immediately upon publication.

The Information Security Policy is reviewed annually during the Management Review.

3 HISTORY OF REVISIONS

Created by		Verified by	Approved by
CISO		Management	Management
Rev.	Date	Description	
00	29/12/2025	First issue	