

Information Security and Personal Data Protection Policy

Arrow Diagnostics S.r.l is committed to protecting people, corporate information assets from internal or external, intentional or accidental threats and to carrying out business activities in full compliance with Information Security.

Arrow Diagnostics S.r.l is committed to implementing, managing, monitoring, reviewing, maintaining and improving the management system for Information Security and Personal Data Protection in accordance with the UNI CEI EN ISO/IEC 27001:2024 Standard and EU Regulation 2016/679 and Legislative Decree 196/2003 as amended, guaranteeing its employees and customers secure products in compliance with information security and personal data protection.

Arrow Diagnostics S.r.l is committed to the application of appropriate technical and organizational measures aimed at guaranteeing the security of data and deriving from a risk analysis process.

Arrow Diagnostics S.r.l undertakes to comply with the obligations to comply with the General Data Protection Regulation (GDPR/RDGP) directly applicable as of May 25, 2018, through:

- the processing of the register of processing activities (both as Data Controller and External Data Processor);
- the data protection impact assessment, where applicable;
- designation of a Data Protection Officer and
- definition within (and if necessary external) of roles and responsibilities related to data processing.

Arrow Diagnostics S.r.l is committed to complying with the data protection principles contained in the GDPR to ensure that all data is:

- processed by demonstrating accountability, in compliance with the principles of privacy by design and by default;
- processed in a lawful, correct and transparent manner;
- collected for specified, explicit and legitimate purposes, and subsequently processed in a manner that is compatible with those purposes;
- adequate, relevant and not overabundant;
- accurate, kept up to date and stored for as long as necessary;
- secure and processed in accordance with the rights of the data subject;
- not transferred abroad without adequate protection.

The General Responsibilities of the Data Controller for any processing of personal data that it carries out directly or that others carry out on its behalf have been established. In particular, appropriate and effective measures are put in place, so that we are able to demonstrate the compliance of processing activities with the GDPR that take into account the nature, scope, context and purposes of the processing, as well as the risk to the rights and freedoms of natural persons.

It is also intended to ensure that:

- the information is protected from unauthorized access and is not disclosed to unauthorized persons;
- detailed training programs on Information Security and Personal Data Protection are defined for all internal employees and for all external personnel who work for extended periods within the organization should the latter eventuality occur;
- the integrity of the information is protected and safeguarded from unauthorized modification;
- a procedure for controlling access to information based on the Company's security and business access requirements is defined, documented and periodically reviewed, detailing on the basis of physical and logical access;
- the procedure for timely communication and management of incidents in the event of a threat to information security is defined and documented, especially when these involve personal data (Data Breach);
- the information is available to authorized users when they need it;
- plans are drawn up for the continuity of the company's business, and that these plans are kept as up-to-date and controlled as possible;
- when access to the Organization's information or assets is granted by a third party, appropriate controls are implemented before granting access.

The Management of Arrow Diagnostics S.r.l. defines this Policy and undertakes to review it during the Management Review, in order to confirm or update it as necessary, committing itself to ensure that this policy is understood, implemented and supported by all personnel at all levels.

Each employee of Arrow Diagnostics is responsible for maintaining and improving the Information Security Management System, providing their fundamental contribution to the achievement of the Objectives through concrete daily actions.

The Information Security and Personal Data Protection Policy is published on the www.arrowdiagnostics.it website, made available to interested parties and communicated to all company personnel.

Genova, 26/11/2025

The President

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