



FCA Data Privacy Guidelines

FCA Group intends to protect values such as confidentiality and personal data protection rights, in compliance with applicable laws.

In order to attain this purpose:

- The companies of the FCA Group shall process the personal data belonging to employees, contractors, suppliers, customers and any other persons with whom a relationship of any kind is in place, in compliance with any applicable laws in force in the countries where the Group is operating, as well as in order to create a protected environment in order to enable, when necessary, the transfer of the personal data between the companies operating in different countries, to the extent permitted and in compliance with security standards provided for by the applicable laws;
- Personal data shall be processed for legitimate purposes and in relation with business objectives (including, but not limited to, activities related to the recruiting of employees or marketing actions) in compliance with the principles of relevance, pertinence, and utilizing processing methods adequate to such objectives;
- Personal data processing shall be performed in compliance with processes and procedures provided for by the FCA Group's system protection of company data, according to which all data is classified in order to determine and perform any and all necessary security measures;
- Sensitive data (including, without limitation, data that could allow the disclosure of political opinions, sexual orientation, racial origin, health condition, etc.) and judicial data processing operations shall occur only when strictly necessary to pursue FCA Group business objectives and always in compliance with applicable laws, within the limits permitted by the applicable laws and, when necessary, upon the consent of the interested person;
- Each interested person is notified regarding the purposes of each processing operation of his/her personal data;
- The interested person's rights, such as, among others, the right to access his/her own personal data, the right to obtain the updating, rectification or integration of data, the right to cancel the data in cases provided for by the applicable laws, etc., shall be respected;



- Personal data may be disclosed to third parties, in relation to processing purposes and subject to the interested person's consent, when required by applicable laws.
- Because FCA Group operates globally, the personal data may transfer within our global Companies but always subject to the limitations of applicable data protection law and this Data Privacy Guidelines.
- The US Companies of FCA Group comply with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland.

Or The US Companies of FCA Group have certified to the U.S. Department of Commerce that it adheres to the Privacy Shield Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement.

To learn more about the Privacy Shield program, please visit <https://www.privacyshield.gov>. Compliance with the Privacy Shield framework demonstrates the adequate privacy protection required by the European Commission's Regulation.

- Without prejudice to the legal responsibility of the relevant Group company with respect to their own personal data processing operations, Fiat Group shall identify intergroup teams and committees aimed to provide Group companies with updates about legal and case law developments on data privacy matters.

Updated as of February 6, 2018