

SARA AGNELLO

Summary

In Stellantis Group since 2004 as Internal Audit I was, in 2011, the Holdings Companies Compliance Officer; from 2013 to 2017, I was in FCA ITALY S.P.A. as Commercial Operation Legal Counsel and from 2014 until now, I'm the Legal Reference of the Stellantis Group EMEA Privacy Office with the responsibility to support the Group DPO for providing advice in law interpretation, drafting up notes and providing methodological direction, ensuring a common privacy approach within the Stellantis Group.

From 2018 I'm the Data Protection officer of FCA SECURITY S.c.p.A.

Starting from 2017 until now, I'm also responsible for the Legal Dept. of the FCA Services Companies and its affiliates - in Poland, France, UK, Germany, Belgium, Spain, Serbia, Malesia, US and Brasil.

I have consolidated my professional experience in an international context – as legal counsel and as auditor /compliance officer (performing activities also outside Italy - in US, Brasil, France, Spain, Switzerland,...).

I had the opportunities to examine the local regulations from different perspective and looking for creative solutions to converge into strategies profitable for the internal department and safe for the business.

The relationship established with the Data Protection Authorities with whom I have a good informal communication, has been fundamental to prevent issue and risk to perform non – compliance initiatives.

Experience

2017/PRESENT

- General Counsel, with direct reporting to the Stellantis Group General Counsel and to the managing directors of the companies operating in the sector of administrative services, insurance, company welfare (employees associations; health and pension funds), sustainability report and internal corporate security services: FCA Services S.p.A., FCA Risk Management S.p.A. and FCA Security S.c.p.a. and their foreign subsidiaries in EMEA, LATAM, APAC and North America Regions. The activities is performed managing three resources.

- Member of the Supervisory Body pursuant to Legislative Decree 231/01

2014/PRESENT

- Data Protection Officer of FCA SECURITY S.c.p.A.

- Legal Representative in the Stellantis EMEA Privacy Office supporting the Stellantis GROUP Data Protection Officer (the "DPO").

The activities is performed coordinating the Countries Privacy Offices in EMEA Region and, as legal support of the Stellantis Group DPO, managing the Global and Regionals Privacy Offices (LATAM, APAC and North America) to ensure a common approach on privacy matter within the Stellantis Group.

The daily activities is executed working with cross-functional and worldwide teams to achieve business objectives: Human Resources – on employees initiatives – Legal, Cyber Security/Information Technologies Dept., Marketing, Product Development and Purchasing Dept. for the agreements negotiation with services providers or with external partners to develop data initiatives (e.g. data monetization, big data lake, connectivity projects, targeting/profiling and customer loyalty, retention data, artificial intelligence,...).

With the Internal Audit the cooperation is close and fruitful. In particular, they receive my support drafting the annual audit plan on privacy topic and in the training initiatives that I usually project and customize for them.

Below the main activities and responsibilities:

- Identify and evaluate the company's data processing activities supporting the census activities on the data processing and maintain records of processing operations;
- Support the internal department drafting, negotiating and finalizing the privacy documents for the business activities;
- Provide advice and instructions on how to conduct Data Protection Impact Assessments (DPIAs);
- Monitor data management procedures and compliance within the companies also coordinating the internal audit activities;
- Participate in meetings with managers to ensure privacy by design at all levels;
- Keep regularly meetings and relationship with the Data Protection Authorities and support the Group Companies during the privacy inspections;
- Write and update detailed data protection policies;
- Manage the issue relating to the data breach, data subject GDPR complaints and rights;
- Liaise with other organizations (supplier, partner) that process data on behalf of the Stellantis Group Companies (e.g.: Data Export Agreement, Data Processing Agreement);
- Coordination of Global/EMEA awareness/training initiatives on privacy policies and procedures;
- Follow up with changes in law and in the "soft law" and issue recommendations to ensure compliance.

2018/2021

Data Protection Officer of FCA SEPIN S.c.p.A. with its Medical Diagnostic Health Center.

2013/2017

- Legal Commercial Operational Counsel in FCA ITALY S.p.A. with the following responsibilities managing two resources:
 - Legal Counsel of the Business Center Italy - Commercial Operations Dept.
 - Secretary of the Supervisory Body pursuant to Legislative Decree 231/01.

The position was carried out by supporting the commercial and finance organization as well as the FCA Bank S.p.A. in the management of the FCA dealer network. In particular, the main activities were the following:

- Monitoring the compliance of commercial policies with the relevant Italian and European legislation (Antitrust, Consumer Code,...) as well as the contractual provisions in place with distributors;
- Managing critical distributors in order to analyze, monitor and identify risks related to the business continuity and credit risks with particular reference to business crises (Bankruptcy law, debt restructuring agreements, ...);
- Managing the legal proceeding and litigation with the dealer and customer.

2011/ 2013:

Compliance Officer / Internal Audit / Privacy Coordinator with direct reporting to the Internal Audit of the Fiat Group.

2004/2011:

Internal Audit: Head of Forensic Audit of Fiat Group.

1999/2004:

- Attorney at Ordine Avvocati di Torino.
- External Consultant in Privacy Matter for ISVOR FIAT S.c.p.A.

OTHER EXPERIENCE

- Teaching job for the “*Associazione Italiana Internal Audit*” and for “Bureau Veritas” on Privacy, Health and Safety and Anti Bribery Regulations.
- Speaker at the seminar organized by the Turin Polytechnic: “*Algorithms and Business Automation*”
- Speaker and teacher at the Training Course on Data Protection, organized by Paradigma S.p.A.
- Member of the Privacy Work Stream in ACEA (Brussels), ASSONIME (Rome) and Confindustria (Turin).
- **2019/2020** Data Protection Officer of ATIVA S.P.A. Company that manages the motorways in the north of Italy, as well as the design, construction, management and operation of all any related completions, branches and connections.

Education and training

- Attorney in Italian Civil Law, Insurance regulation and Privacy Laws.
- Degree in Law at the Faculty of Law of the University of Genoa.

Languages and technical skills

- **ITALIAN:** Mother tongue
- **ENGLISH:** Good (written and spoken)
- **COMPUTER SKILLS:** Word, Excel, PowerPoint.

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