

Subject: Information on the processing of your personal data pursuant to Art. 12 et seq. of EU Regulation 2016/679 of April 27, 2016 (GDPR).

Introduction – The GDPR provides for the protection of individuals and other subjects with regard to the processing of personal data. According to this regulation, the processing of personal data related to a subject, specifically defined as the “data subject,” is based on principles of fairness, lawfulness, and transparency, as well as the protection of confidentiality and the rights of the data subject. We hereby inform you, in compliance with the aforementioned regulation, that in relation to the relationship or connection you have with our organization, we possess some of your personal data, which have been acquired either verbally directly from you or through third parties who carry out operations concerning you or who, to meet your request, acquire and provide us with information. Under the GDPR, since this data refers to you, it must be classified as “personal data” and thus benefits from the protection provided by this regulation. Specifically, under this regulation, you are the data subject who benefits from the rights protecting your personal data. Pursuant to Art. 12 et seq. of the GDPR, our organization, as the Data Controller, will process the personal data you provide in compliance with the regulation, with the utmost care, implementing effective management procedures and processes to ensure the protection of your personal data. To this end, we, using physical and management procedures to safeguard the data collected, commit to protecting the information communicated to avoid unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of the data.

In accordance with this introduction we provide the following information.

Personal data collected - We, as the Data Controller, use your personal data to operate effectively in our business activities. The personal data requested and processed vary depending on the relationship between us and the data subject, meaning they differ if the data subject is a client, supplier, potential buyer, employee, job applicant, other operator, or subject, etc. You may be asked for the following data, even partially:

- personal details, tax code, VAT number, name, legal headquarters, residence, and domicile;
- data related to the contractual relationship describing the type of contract, as well as information related to execution and necessary for the fulfillment of the contract itself;
- accounting data related to the economic relationship, amounts due and payments, their periodic progress, the summary of the accounting status of the relationship;
- data to make the relationship with our organization more defined and to enhance our collaboration and operational efficiency;
- data related to: education, occupation, personal or professional interests, family composition, opinions on products or services, work phone number, home or work address, information on the profession practiced or about your company.

The data referred to in the last point of the previous list will be considered supplementary information and their provision will be optional.

Retention period of your data: The collected data will be retained for the entire duration of the relationship or collaboration with our organization and for 10 years from the termination date of the employment relationship. If data not related to the administrative-accounting fulfillment of the employment relationship are processed during the employment relationship, such data will be retained for the time necessary to achieve the purpose for which they were collected and then deleted.

Mandatory or Optional Nature of Data Provision and Consequences of Refusal – The provision of data essential for the performance of the relationship, as well as data necessary to fulfill obligations established by laws, regulations, community legislation, or provisions of authorities legitimated by law and supervisory and control bodies, must be mandatory. This includes data indispensable to fulfill an existing contract or to be concluded with the data subject or to respond to your requests for information about services or supplies. The failure to provide such data results in the inability to establish or continue the relationship, to the extent that such information is necessary for its execution. Non-essential data for the relationship, such as information about personal or professional interests, opinions on products or services, work phone number, etc., should be considered supplementary information, and their provision, if requested, is optional. However, your refusal to provide such data will result in reduced efficiency of our organization in conducting relations with you. If “sensitive data” is essential for the relationship or for fulfilling specific services and legal obligations, the provision of such data will be mandatory. Since their processing is only allowed with the written consent of the data subject (according to Art. 23 of Legislative Decree 196/03 and Art. 7 of the GDPR), you must also consent to their processing. For other sensitive data whose processing may become necessary in the future, an additional consent will be requested from you as needed.

Processing Methods – Pursuant to and for the purposes of Art. 12 et seq. GDPR, we wish to inform you that the personal data you have communicated to us will be recorded, processed, and stored in our paper and electronic archives, in compliance with the minimum security measures dictated by the technical regulations in Annex B to the aforementioned legislative decree. Data processing operations will include the following activities: collection, recording, organization, consultation, processing, modification, selection, extraction, comparison, use, and storage. The collection of data not yet in our possession will specifically occur through:

- Data collection from the data subject;
- Data collection from persons other than the data subject;
- Data collection at home;
- Data collection via telephone or telematic means;
- Data collection and dissemination via cable or satellite;
- Data collection through forms and coupons;
- Data collection in public places or places open to the public; data collection from registers, lists, acts, or public documents;

Data collection for processing by third parties. Additional processing operations will specifically consist of:

- Registration and processing on paper support;
- Registration and processing on magnetic support;
- Use of audiovisual media;
- Predominantly automated archive organization;
- Predominantly non-automated archive organization;
- Processing of data collected from third parties;
- Entrusting third parties with processing operations;
- Temporary processing aimed at rapid aggregation of data or transformation into anonymous form;
- Preparation of information relating to fraud or scam indications or suspicions;
- Adoption of decisions exclusively by automated means;
- Creation of professional profiles or candidate profiles;
- Creation of profiles relating to clients, suppliers, or consumers;
- Creation of other profiles;
- Verification and modification of data only at the request of the data subject.

Processing of personal data will be carried out using tools and procedures suitable to ensure their security and confidentiality, and may be conducted directly and/or through delegated third parties, either manually using paper supports or with the aid of computer or electronic means. For the correct management of the relationship and compliance with legal obligations, the data may be included in the internal documentation of the Controller and, if necessary, also in the legally required books and registers.

Activities potentially outsourced - In the course of its activities, the Data Controller may occasionally require other operators to perform certain services on its behalf, such as processing services or other services; services necessary for the execution of requested operations or services; shipping and deliveries; accounting records; administrative activities. In the case of employment relationships, services such as payroll preparation or processing to comply with contribution, tax, and administrative requirements may also be commissioned. If the operator delegated by the Controller to perform certain activities is a company providing payment, collection and treasury services, banking and financial intermediation, the following services may be carried out: mass processing of payments, drafts, checks, and other securities; transmission, enveloping, transport, and sorting of communications; documentation archiving, financial risk assessment; fraud control; debt collection. Only information necessary for the provision of the commissioned services will be provided to the aforementioned operators, and they will be required to maintain confidentiality, prohibiting the use of the provided data for any purpose other than the agreed one. Operators who are not our data processing appointees (pursuant to Art. 29 of the GDPR) or our Data Processors (pursuant to Art. 28 of the GDPR), will be autonomous Data Controllers and will process the data only to the extent strictly necessary to provide the commissioned service and exclusively for that purpose. For anything not indicated here, these subjects must then provide specific information on the personal data processing they carry out. These subjects are obligated to maintain confidentiality regarding the information received on behalf of the undersigned and may not use it for purposes other than the services they perform on behalf of the undersigned. The undersigned may decide to assign further tasks to the providers of these services and/or may turn to new providers. Your personal data will be shared by the undersigned with third parties, who, if not our Data Processing Appointees or Data Processors, may process your personal data only with your express consent, unless sharing is required or provided for by law or local legislation, or is necessary for the exercise of legal action or within the framework of a legal action in which the undersigned is a party or is otherwise involved.

If you allow us to communicate your personal information, we guarantee that it will be used solely to support the relationship that may arise or that is maintained with you. The personal information collected may be stored and processed in a country other than Italy, but belonging to the EU.

Purpose of the processing of personal data – The main purpose of the processing of your personal data that the undersigned intends to carry out is to enable a regular establishment and/or development, as well as proper administration of the relationship specified in the preamble. In particular, the purposes of the processing are as follows:

Administrative-accounting purposes, in particular:

- Fulfillment of tax or accounting obligations;
- Management of movable and immovable assets;
- Customer management (administration of customers; administration of contracts, orders, shipments, and invoices; control of reliability and solvency);
- Supplier management (administration of suppliers; administration of contracts, orders, deliveries, invoices; selection according to company needs);
- Management of disputes (contractual defaults; warnings; settlements; debt recovery; arbitrations; judicial disputes);
- Internal control services (security, productivity, service quality, asset integrity);

Related to commercial activities, in particular:

- Mail-order or telephone sales (offering goods and services through mailing lists);
- Online or telemarketing sales;
- Data commercialization (collection and processing of personal data for sale or transfer);
- Marketing (market analysis and surveys);
- Advertising;
- Promotional activities; Games or prize competitions;
- Customer satisfaction surveys;

Personal data will be processed to fulfill legal obligations, as well as to meet administrative, social security, insurance, and tax obligations provided by current regulations and also to satisfy accounting and commercial purposes, or to regularly fulfill contractual and legal obligations arising from the legal relationship with the data subject. Additionally, the data provided may be used to contact the data subject as part of market research concerning products or services or as part of offers or commercial campaigns. The data subject may freely choose not to give their consent for such purposes and also indicate the methods by which they prefer to be contacted or to receive commercial information.

Scope of Knowledge of Your Data - The following categories of subjects, appointed as data processors or data handlers by the undersigned, may become aware of your data:

Employees or collaborators generally assigned to:

- Internal protocol offices and secretarial offices;
- Personnel in charge of maintenance and/or repair; personnel in charge of surveys and service provision;
- Personnel in charge of managing historical archives;
- Personnel in charge of accounting and invoicing;
- Personnel in charge of marketing services;
- Personnel in charge of measuring customer, user, and subscriber satisfaction; personnel in charge of fraud and scam prevention;
- Personnel in public relations offices;
- Peripheral offices, services, and branches;
- External personnel for the mailing of correspondence;
- Consultants appointed for consultancy, assistance, or services to our organization;
- Executives and administrators;
- Members of control bodies;
- Our agents, representatives, and distributors.

Personal data may also be known by parties contracted with the undersigned, as indicated in the paragraph titled "Methods of Processing." The undersigned may delegate the execution of certain tasks or the performance of specific actions required for the execution of the relationship with the data subject to such

parties.

Disclosure and Dissemination - Your data may be disclosed, meaning shared with one or more specific entities, by the undersigned, worldwide, including: constitutional or significant constitutional bodies; health organizations, medical and paramedical personnel; educational institutions of all levels and universities; social security and welfare institutions; armed forces; police forces; judicial offices; local authorities; associations of local authorities; non-economic public entities; chambers of commerce, industry, crafts, and agriculture; other public administrations; economic public entities; professional orders and colleges; employers; employment agencies; intermediary agencies; associations of entrepreneurs and businesses; trade unions and patronages; bipartite labor organizations; vocational training institutes; consultants and freelance professionals, including in association; companies and enterprises; parent companies; subsidiaries and affiliates; banks and credit institutions; non-bank financial intermediaries; credit risk centers; insurance companies; associations and foundations; volunteer organizations; members, associates, and subscribers; customers and users; family members of the data subject; public dissemination.

Your data may be disclosed by the undersigned as follows:

- To entities who may access the data under legal, regulatory, or EU provisions, within the limits set by these norms;
- To entities that need to access your data for purposes auxiliary to the relationship between you and us, strictly within the necessary limits to perform auxiliary tasks (e.g., credit institutions and shippers);
- To our consultants and/or professionals, within the necessary limits to perform their duties at our or their organization, following our letter of assignment imposing confidentiality and security obligations.

In any case, your data will not be disclosed except to operators executing acts related to fulfilling the relationships with the data subjects to whom the data refer.

Dissemination - The undersigned will not indiscriminately disseminate your data, meaning they will not be shared with unspecified entities, even by making them available or through consultation.

Trust and Confidentiality - The undersigned values the trust shown by data subjects who consent to the processing of their personal data and commits not to sell, rent, or lease personal information to others.

Rights of Data Subjects - Pursuant to Article 7 of Legislative Decree 196/2003 and Articles 15 and following of the GDPR, you have the right to obtain confirmation of the existence or non-existence of personal data concerning you, even if not yet recorded, and their communication in an intelligible form. You have the right to obtain confirmation of:

- The origin of the personal data;
- The purposes and methods of processing;
- The categories of personal data;
- The period of data retention;
- The logic applied in case of processing carried out with the aid of electronic instruments;
- The identifying details of the data controller, data processors, and the designated representative;
- The subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them as designated representatives in the territory of the State, data processors, or persons in charge of processing.

You also have the right to obtain:

- a) Access to, the updating of, the rectification of, or, when interested, the integration of the data and the limitation of their use;
- b) The deletion, transformation into anonymous form, or blocking of data processed in violation of the law, including those for which retention is unnecessary for the purposes for which the data were collected or subsequently processed;
- c) The certification that the operations referred to in letters a) and b) have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disseminated, except in cases where such compliance proves impossible or involves a manifestly disproportionate use of means concerning the protected right;
- d) The right to data portability does not apply to the context in which the processing is entrusted to the undersigned;
- e) For data processed requiring your consent, you may withdraw your consent at any time, and in such case, the Data Controller will proceed with the immediate deletion of any personal data referable to

you that concerns the scope of the consent you have expressed.

You have the right to object, in whole or in part:

- a) For legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of collection;
- b) To the processing of personal data concerning you for the purpose of sending advertising materials or direct sales, or for conducting market research or commercial communication;

To exercise these rights, you may contact the relevant department.

You may also file a complaint with the supervisory authority (Data Protection Authority) at any time.

Data Controller and Data Processor - The data controller is the undersigned.

Processing Without the Need for Data Subject's Consent - It is specified that, even in the absence of your consent, the undersigned will be entitled to process your personal data if necessary for:

- Compliance with a legal obligation, a regulation, or community legislation;
- Fulfilling obligations arising from a contract to which you are a party or to comply with specific requests made by you before the conclusion of the contract.

Moreover, your explicit consent is not required when the processing:

- 1) Concerns data from public records, lists, acts, or documents accessible to anyone, within the limits and methods established by laws, regulations, or community legislation regarding the accessibility and publicity of data, or data related to the performance of economic activities, processed in compliance with current legislation on business and industrial secrecy;
- 2) Is necessary to safeguard the life or physical integrity of a third party (in this case, the controller is required to inform the data subject about the processing of their personal data through a notice, even after the processing, but without delay. In this scenario, consent is given following the provision of the notice);
- 3) Excludes dissemination and is necessary for the conduct of defensive investigations under Law No. 397 of December 7, 2000, or, in any case, to assert or defend a right in judicial proceedings, provided that the data are processed exclusively for such purposes and for the period strictly necessary for their pursuit, in compliance with current legislation on business and industrial secrecy;
- 4) Excludes dissemination and is necessary, in cases identified by the Data Protection Authority based on the principles established by the law, to pursue a legitimate interest of the data controller or a third party recipient of the data, also in relation to the activities of banking groups and controlled or affiliated companies, as long as the fundamental rights and freedoms, dignity, or legitimate interest of the data subject do not prevail.