



Dear Stakeholders,

Pursuant to the applicable legislation on the protection of personal data (hereby the “**Privacy Legislation**”), including Regulation (EU) 2016/679 (hereby the “**GDPR**”) and Legislative Decree 196/2003 as amended by Legislative Decree 101/2018, Reno De Medici S.p.A., as Data Controller (hereinafter the “**Company**” or the “**Data Controller**”), hereby inform you that it will process the personal data that you provide to the Company (the “**Personal Data**”), as Stakeholder or potential Stakeholder (hereby “**Stakeholder**”), in the manner and for the purposes described herein.

1. PERSONAL DATA CONTROLLER AND DATA PROCESSOR

The Data Controller is Reno De Medici S.p.A., with registered office at Viale Isonzo 25, 20135, Milan, VAT Number 00883670150.

The Company has appointed a Data Protection Officer (in brief “**DPO**”), domiciled for the purpose at the Company’s registered office, who can be contacted at the following addresses:

- postal address: Reno De Medici S.p.A.- Data Protection Officer: Viale Isonzo 25, 20135 – Milan (MI);
- DPO email: dataprotectionofficer@rdmgroup.com.

2. PURPOSES, LEGAL BASES OF PROCESSING AND RETENTION TIMES

The Company will process your Personal Data, without the need for your prior consent to the processing, for the following purposes and in compliance with the following legal bases:

2.1 Purposes related to the execution of a current company contract

In order to give correct and full execution of the current company contract between Shareholder and the Company (in particular, by virtue of the Articles of Association, internal regulations, company resolutions) or to fulfil obligations, including the administrative and accounting obligations and management of Shareholders’ meetings (including the activities necessary to ensure the participation of partners/Shareholders in the Company’s meetings) or to respond to requests arising from your role as a Shareholder and partner of the Company, including by means of distance communication techniques.

The legal basis of the processing consists of the execution of the company contract between Shareholder and the Company.

The retention period of your Personal Data corresponds to the duration of the relationship, subject to the retention requirements for other purposes listed in this information note.

2.2 Purposes related to compliance with legal obligations

These are the purposes related to fulfilling obligations established by national and/or European laws or regulations to which the Data Controller is subject (e.g. verification of the proper establishment of the meetings, verification of the identity and entitlements of those present at the meetings, recording and minuting of speeches and votes at the meetings, etc.), as well as by orders issued by the Authority empowered to do so by the law and/or by supervisory and control bodies, and the purposes of preparing declarations and documents, such as the consolidated non-financial statement to which the Company is required pursuant to Legislative Decree 252/16.

The legal basis of the processing consists of fulfilment of legal obligations to which the Data Controller is subject. The retention period of your Personal Data is differentiated in accordance with the relevant legislation (for example, the mandatory retention period for records and correspondence is **10 years**, without prejudice to the need for preservation for other purposes as listed in this information note.

2.3 Purposes related to judicial protection of the Data Controller

These are purposes related to the protection of the Company’s rights and the management of any complaints and/or disputes of any nature and at any level and in any instance, whether judicial or extrajudicial.

The legal bases of the processing are, depending on the type of processing and the dispute, the contract, the legal obligations and the legitimate interest in ascertaining, exercising or defending a right of the Data Controller within judicial proceedings; therefore, again here, in accordance with the legislation, your consent is not required.

The period of retention of your Personal Data is differentiated in accordance with the applicable legislation, without prejudice to the need for retention for other purposes as listed in this information note.



2.4 Purposes of reporting and internal control

Purposes related to verification of the functionality and adequacy of the internal organisation, in order to ensure the compliance of the processes with the provisions of law and to ensure the proper functioning of the Company as Issuer.

The legal bases of the processing are, depending on the type of controls and analyses conducted, the statutory obligations and the legitimate interest of the Data Controller; therefore, again here, in accordance with the legislation, your consent is not required.

The period of retention of your Personal Data is differentiated in accordance with the applicable legislation, without prejudice to the need for retention for other purposes as listed in this information note.

3. HOW WE PROCESS YOUR PERSONAL DATA

The processing of your Personal Data is carried out manually and/or using IT and telematic means for the purpose indicated in Paragraph 2 above and, in any case, in a manner that guarantees their security and confidentiality.

We also inform you that your Personal Data:

- shall be processed in accordance with the principles of legality, propriety and transparency;
- will be collected for the legitimate purposes established under Paragraph 2 above;
- will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, if necessary, up-to-date;
- shall be retained in a form that permits the identification of the data subject (i.e. the partner or shareholder) for a period of time not exceeding the achievement of the objectives, as specified in greater detail in Paragraph 2 above.

It should also be noted that during Shareholder meetings of the Company, the processing of your Personal Data (e.g. declarations relating to the subject matter of the meeting) may also take place through the use of an audio recording system, for the sole purpose of facilitating the subsequent minuting of the meeting. Specifically, with regard to the audio recordings of Company meetings, they will be kept together with documents submitted during these meetings for the sole purpose of documenting and supplementing the minutes of the meetings. Once the minutes are complete, these audio recordings will be destroyed unless there is a need for retention for other purposes as listed in this note.

4. NATURE OF PERSONAL DATA PROVISION

The processing of your Personal Data is a legal obligation or obligation arising from the contract between the Shareholder and the Company.

Any refusal by you to provide such Personal Data may result in the Company not being able to fulfil statutory obligations or to fulfil requests made by you.

5. PERSONAL DATA COMMUNICATION

Your Personal Data will be processed by employees of the Company specifically designated as authorized persons to process your personal data when necessary for the pursuit of the purposes set out in Paragraph 2 of this information note.

Your Personal Data may be disclosed to additional recipients, either as autonomous data controllers or, where necessary, appropriately appointed data processors, including but not limited to:

- a. companies or other entities responsible for managing and maintaining the Company's information systems;
- b. companies or other entities responsible for managing and updating the Company's shareholders' register;
- c. other subsidiaries and/or affiliates of the Data Controller;



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- d. companies, professional firms or freelancers appointed to provide advice and assistance in the corporate actions undertaken by the Company or in the organisation/management of the Company meetings and related activities;
- e. Institutions and/or Public Authorities (Courts, the Consob Authority, etc.) to fulfil specific legal/regulatory obligations;
- f. companies/centres for banking services and/or credit institutions for the transmission of data aimed at completing securities transfer transactions and bank orders (e.g. dividend payments);
- g. proxy solicitation promoters for attendance at meetings, in the cases provided for by law.

In addition, some of your personal data may be disclosed to the financial market in accordance with applicable legislation and CONSOB regulations.

The full list of recipients of your Personal Data is kept at the Data Controller's registered office and can be consulted on request using the contact details indicated in Paragraph 7 below.

6. TRANSFER OF PERSONAL DATA OUTSIDE THE EU

Your Personal Data will not be subject to transfer to third countries outside the EU and will not be subject to transfer to recipients other than those referred to in this note.

Any transfer of your Personal Data to countries outside the EU may take place only under the terms and with the guarantees stated by the Privacy Legislation and, in particular, pursuant to Articles 44-49 of the GDPR.

7. YOUR RIGHTS

The Company recalls that you are granted the rights set out in Articles 15 – 21 of the GDPR. In particular, you have the right to access your Personal Data, to request that they be rectified or updated if they are incomplete, incorrect or collected in violation of Privacy Legislation or their deletion, or to object to or restrict their processing. You are also entitled to receive (or to transmit directly to another data controller) the Personal Data concerning you in a structured, commonly used and machine-readable format.

You are also entitled to lodge a complaint with the Data Protection Authority if you believe that the processing of your personal data violates the Privacy Legislation.

You may exercise your rights at any time by simple request to transmit:

- by email, to the address: RDM-GDPR@gruppoRDM.com;
- DPO email: dataprotectionofficer@rdmgroup.com;
- by surface mail, to the registered office of Reno De Medici S.p.A. at: Viale Isonzo 25, 20135 – Milan (MI).