

NEWSLETTER SUBSCRIPTION PRIVACY POLICY

Dear User,

For the purposes provided for in EU Regulation No. 2016/679 on the protection of natural persons (hereinafter, "**Regulation**"), we inform you that the personal data provided and acquired will be processed in accordance with the provisions of the said Regulation under the following conditions.

1. Data Controller

The data controller of personal data for the activities described below is Sofidel S.p.A., with registered office in via G. Lazzareschi n. 23 - 55016 Porcari (LU), which can be contacted at the following e-mail address gdpr.holding@sofidel.com (hereinafter, "**Data Controller**").

2. Data Protection Officer (DPO)

The Data Protection Officer appointed by the Data Controller (hereinafter, the "**DPO**") can be contacted at the following address: dpo.holding@sofidel.com.

3. Type of personal data

The personal data processed will be the information you provide for the newsletter subscription and may include identifying and contact information, including but not limited to first name, last name, email, etc.

4. Purpose and legal basis for processing

Personal data is processed for the purpose of sending the informational newsletter that promotes the Data Controller's activities and raises awareness regarding strategic issues for the Data Controller, such as those related to sustainability.

The legal basis for the processing can be found in the consent you have given, in accordance with the provisions of Article 6.1 letter a of the Regulations. You may always revoke your consent by notifying the Controller and/or the DPO at the addresses indicated above.

Providing your personal data is optional. If you refuse to provide the information, it will be impossible for the Data Controller to send you the newsletter.

5. Personal Data processing methods

The processing will be performed using procedures, including computerized procedures, to the extent necessary to pursue the purposes mentioned above, in compliance with the principles of lawfulness, correctness, relevance, and non-excessiveness.

Your personal data may be shared with:

- Entities that typically act as data processors under Article 28 of the GDPR. An up-to-date and complete list of such entities may be requested from the Data Controller at the contact details above
- Personnel tasked with processing under Article 29 of the GDPR
- Other Sofidel Group companies for administrative-accounting purposes.

6. Transfer of data to Countries outside the EU

Regarding any transfer of personal data to countries outside the EU, the Data Controller informs that the processing will take place according to one of the methods permitted by the applicable law, such as:

- The presence of adequacy decisions issued by the European Commission
- The adoption of standard contractual clauses approved by the European Commission
- In the event that the warranties identified above do not apply, on the basis of your consent given by you after being informed of the risks inherent in the transfer

More information is available upon request from the Data Controller at the contact details above.

7. Storage of Personal Data

Your Personal Data will be kept only as long as necessary for the purposes for which it is collected, respecting the principle of minimization outlined in Article 5.1.c) of the Regulations.

8. Rights of the Data Subject

You have the right to exercise, at any time, the following rights in relation to your Personal Data processed under this privacy policy, including:

Right of access and right to rectification (Articles 15 and 16 of the Regulation): you have the right to access your personal data and to request that such data be corrected, amended, or supplemented, being able to obtain a copy of the data held by the Data Controller.

Right to data erasure (Article 17 of the Regulation): in the cases set out in the current regulation, you can request the erasure of your personal data. Upon receiving and analyzing your request, the Data Controller shall be responsible for ceasing to process and for erasing your personal data when the request is found to be legitimate.

Right to restriction of processing (Article 18 of the Regulation): you have the right to request the restriction of processing of your personal data in case of unlawful processing or contesting the accuracy of your personal data.

Right to notification regarding rectification or erasure of personal data or restriction of processing (Article 19 of the Regulation): you have the right to have each of the recipients to whom your personal data has been transmitted notified of any correction or erasure or restriction of processing made pursuant to Articles 16, 17(1), and 18 of the Regulation, unless this proves impossible or involves a disproportionate effort. The Data Controller is required to notify you of these recipients should you request such notification.

Right to data portability (Article 20 of the Regulation): you have the right to request to obtain your personal data from the Data Controller in order to transmit them to another Data Controller, in the cases set out in the article in question.

Right to lodge a complaint (Article 77 of the Regulation): you have the right to lodge a complaint with the competent Data Protection Supervisory Authority if you believe that a violation of your rights has occurred or is occurring, with regard to the processing of your personal data.

Requests relating to the exercise of one or more of the above rights may be addressed to the Data Controller or the DPO at the following contact details, as also indicated above: gdpr.holding@sofidel.com; dpo.holding@sofidel.com.