

PRIVACY POLICY pursuant to Article 13 of EU Regulation 2016/679

Please find below a description of the essential characteristics of processing to be carried out on your personal data.

FNM S.p.A., with registered office at Piazzale Luigi Cadorna 14 - 20123 Milan, certified email *fnm@legalmail.it*, in its capacity as Data Controller (hereinafter the "Data Controller" or the "Company") informs you that it will process your personal data in order to follow up your request to receive invitations to conferences, events, public meetings, openings, exhibitions and presentations organised by FNM and the other companies of the Group, hereinafter the "**Events**". Upon simple request, using the contact information appearing below (see Paragraph 1), you may exercise those fundamental rights granted to you by the Regulation with respect to the Data Controller. These include the right of access, confirmation and disclosure of your data. For further information, please review the detailed Policy that follows.

Pursuant to Article 13 of EU Regulation 2016/679 (27 April 2016), the General Data Protection Regulation (hereinafter, "Regulation"), we would like to provide you the following information on the processing of your personal data.

1. Identity and contact details of the Data Controller

The Data Controller is FNM S.p.A., with legal headquarters at Piazzale LuigiCadorna 14 - 20123 Milan (MI), certified email *fnm@legalmail.it*. All requests regarding personal data processed by the Company may be sent to the registered address or to the following email address: *privacy@fnmgroup.it*.

2. Purposes of data processing. Legal basis for data processing

We will process your data, and in particular, your name, surname and email address, hereinafter "the data", for the purposes set forth below, along with the legal basis for processing.

2.1 Purposes connected with the performance of a contract or pre-contractual measures (Article 6, paragraph 1, subpart [b] of Regulation (EU) 2016/679).

We will process the data for all purposes resulting from and/or connected to and/or in preparation for:

 the fulfilment of your request to receive invitations to Events. Your email address will be included on the FNM S.p.A. mailing list, managed by the FNM Institutional Relations and Communication Department and used for the sole purpose of inviting you to Events. You may opt in to the service by ticking the appropriate box on the Data Controller's website, <u>www.fnmgroup.it</u>;

We inform you that videos, photos and recordings of the Events may be taken during the Events, which are intended for publication on the website, intranet platform and social media channels of FNM and the FNM Group Companies. By participating in the Events you authorise FNM to publish the same on the aforementioned information channels.

<u>Purposes relating to the fulfilment of a legal obligation to which the data controller is subject (Article 6, paragraph 1, subpart [c], Regulation (EU) 2016/679)</u>

We will process your data insofar as this is necessary to fulfil legal obligations, including those imposed by current tax legislation.

FNM S.p.A.

Piazzale Cadorna, 14 20123 Milano Tel. +39 02 85111 Fax +39 85111 4708 Cap. Soc. € 230.000.000,00 i.v. Iscrizione al Reg. Imp. della C.C.I.A.A. di Milano/Monza Brianza/Lodi C.F. e P. IVA 00776140154 - REA MI 28331 PEC fnm@legalmail.it www.fnmgroup.it





3. Data recipients or categories of data recipients

In order to achieve the objectives set out in paragraph 2, your data may be disclosed to the following recipients, or categories of recipients:

- > third parties, that is, persons authorised to carry out processing under the aegis of the Data Controller;
- the following Data Processors: Growens S.p.A., with registered office in Milan (MI), Tax Code and VAT No. 01279550196, in the person of its Legal Representative pro tempore ("MailUp") as the provider of IT services connected to the email forwarding service; companies appointed for the management of Events; NORDCOM S.p.A., or various and/or additional parties providing maintenance and/or IT assistance services in relation to the Company's systems, databases and IT services;
- entities, companies, public agencies and/or bodies to which data disclosure is necessary or mandated by law.

4. Transfer of data to third countries or international organisations

Your data will not be transferred to third countries or international organisations.

5. Data storage period

As regards the service of receiving invitations to Events, in compliance with the principles of lawfulness, data minimisation and the purposes stated above, your data will be stored until you request cancellation from the service, in the manners set forth in Article 6 below.

Data may be stored beyond such period to comply with specific statutory or regulatory duties, and insofar as needed to ascertain, exercise, or defend a right in a court of law.

6. Cancellation from the Service

To stop receiving the emails with invitation to the Events, you may click on the appropriate link that will be made available each time the email invitation is sent.

7. Rights of data subjects

7.1 Right of access, rectification, erasure and restriction of processing

The Data Subject has the right to request:

- access to data (the Data Subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her is being processed, and, where that is the case, access to the personal data and the following information, as well as where personal data is transferred to a third Country or to an international organisation, the Data Subject shall have the right to be informed of the appropriate safeguards in accordance with relevant regulation);
- rectification of data (the Data Subject shall have the right to obtain from the Data Controller the rectification
 of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the
 Data Subject shall have the right to have incomplete personal data completed, including by means of providing
 a supplementary statement);
- erasure of data (the Data Subject shall have the right to obtain from the Data Controller the erasure of personal data concerning him or her, where provided for by relevant legislation);
- restriction of processing (the Data Subject shall have the right to obtain from the Data Controller restriction of
 processing where provided for by relevant legislation; where processing has been restricted, such personal
 data shall, with the exception of storage, be processed only with the Data Subject's consent or for the
 establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal
 person or for reasons of important public interest of the Union or of a Member state).

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7.2 Right to data portability

Where processing is based on consent or a contract and is undertaken using automated equipment, the Data Subject shall have the right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format, as well as the right to transmit those data to another data controller.

In exercising his or her rights to data portability, the Data Subject shall have the right to have the personal data transmitted directly from one data controller to another, where technically feasible.

The exercise of the right to data portability shall be without prejudice to the right to data erasure. This right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller.

7.3 Right to object

The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller, or processing necessary to pursue a legitimate interest of the Data Controller or of third parties, including profiling based on these provisions. Where personal data is processed for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the Data Subject objects to processing for direct marketing purposes, the parsonal data is processed for scientific or historical research or statistical purposes, the Data Subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her such purposes. Moreover, where personal data is processed for scientific or historical research or statistical purposes, the Data Subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

7.4 Exercise of rights

All the requests relating to the exercise of the rights set out above can be sent to the Data Controller using the contact details indicated above.

8. Right to withdraw consent

Where processing of personal data or particular categories of personal data is based on consent (Article 6, paragraph 1, subpart [a]) and/or Article 9, paragraph 2, subpart (a) of Regulation EU 2016/679, the Data Subject will have the right to withdraw his or her consent at any moment. This will be without prejudice to processing operations carried out before the withdrawal of consent. Consent may be revoked by following the instructions appearing in Article 6 above, or by sending an express request to the Data Controller, using the contact information and addresses appearing supra.

9. Right to make a complaint to a supervisory authority

Where the Data Subject believes that processing of his or her personal data violates relevant legislation, the Data Subject has the right to make a complaint to a supervisory authority, specifically one in the Member state in which they habitually reside or work or in the location in which the supposed violation took place.

10. Nature of data submission; Mandatory nature of data submission, and potential consequences of failing to submit data

The submission of your data is a necessary condition for sending the invitations to Events. Any failure to provide your personal data will make it impossible for the Company to send you the invitations to Events.

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