

**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](mailto: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 comply with your request to i) receive the periodic newsletter of the FNM Group, keep you informed on the activities and initiatives of FNM and the Group companies, obtain detailed information about the projects implemented and those to come, find out about local interventions under way, discover new services and participate in upcoming events (hereinafter the "Newsletter"); ii) receive invitations to conventions, events, public meetings, inaugurations, exhibitions and presentations organised by FNM and the other Group companies (hereinafter "the Events"); iii) participate in 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.

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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 Luigi Cadorna 14 – 20123 Milan (MI), certified email [fnm@legalmail.it](mailto: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](mailto: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:

- 1) the fulfilment of your request to subscribe to the **Newsletter** which will be sent periodically to the email address you have provided. You may opt in to the service by ticking the appropriate box on the Data Controller's website, [www.fnmgroup.it](http://www.fnmgroup.it);
- 2) 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, [www.fnmgroup.it](http://www.fnmgroup.it);
- 3) the fulfilment of your request to participate in Events.

2.2. The Data Subject has expressed consent to the processing of his/her personal data for one or more specific purposes (Article 6, paragraph 1, subpart [a], Regulation (EU) 2016/679).

**FNM S.p.A.**

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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](mailto:fnm@legalmail.it)  
[www.fnmgroup.it](http://www.fnmgroup.it)



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. The use of such data is subject to your consent. Where, due to the specific technological solutions used, the filming of the Event is necessary (e.g. webinar events), if you do not provide consent to the provision of your data, you will not be able to participate in the Event.

*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)*

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

### **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 the Newsletter and 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 respective services, in the manners set forth in Article 6 below.

With regard to participation in Events, your data will be stored for five years from the date of the Event; any videos, photos and recordings will be stored as long as the Event is published on the website, intranet platform and social media channels of FNM and the FNM Group Companies and in any case until your consent is revoked.

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 **Newsletter**, you may click on the appropriate link that will be made available each time the newsletter is sent. Likewise, should you no longer wish to receive invitations to Events, you may click on the appropriate link that will be made available each time an 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).

### **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 personal data shall no longer be processed for 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 newsletter;
- sending invitations to Events;
- participation in Events.

Any failure to provide your personal data will make it impossible for the Company to:

- send you the newsletter;
- forward you invitations to Events;
- allow you to participate in the Event of interest; failure to provide consent to the use of any videos, photos and recordings will make it impossible for the Company to use the aforementioned data. Where, due to the specific technological solutions used, the filming of the Event is necessary (e.g. webinar events), if you do not provide your data, you will not be able to participate in the Event.