

PRIVACY POLICY for the SHAREHOLDERS

According to Art. 13 of Regulation (EU) 2016/679



Dear Shareholder,

according to the processing of your personal data, we submit the Privacy Policy provided by Prima Industrie S.p.A. (from now on "The Company"), needed for your personal data protection, according to the relevant legislation.



Controller of personal data, DPO and useful contacts

Prima Industrie S.p.A. is the Company that processes your data and further to the regulation, is considered as **Controller of Personal data Processing**. In this capacity the Company is responsible to ensure the application of organizational and technical measures necessary and adequate for the protection of your data.

The Company Headquarter is in Via Antonelli 32—10093 Collegno (To) - Italy (Tel +39 011 41031).

Moreover, the Company has designated the **Data Protection Officer** who is in charge of ensuring compliance with the rules for your privacy protection and shall be contacted for matters concerning your data processing at the following dedicated e-mail address: dpo@primaindustrie.com.

Further information regarding your rights can be found in the dedicated section "your rights".



Information on the methods and duration of the treatment

Methods and Purpose of processing your data

We specify that all personal data provided by you (for example, name and surname, address, date of birth, identity card, tax code with the exclusion of particular categories of data), communicated by third parties or taken from public sources and those referred to third parties (for example, personal data of delegated subjects or their substitutes) are processed in compliance with current privacy regulations. The Company will treat them according to principles of correctness, lawfulness, transparency, with respect to the purposes indicated below, collecting them to the extent necessary, making them use only by authorized personnel trained in paper, IT or telematic tools. During the meeting, the processing of data also takes place through the use of an audio/video recording system for the sole purpose of facilitating the minutes of the meeting.

Your personal data will be processed for the following purposes related to the execution of the social contract: (i) keeping of the shareholders' register and related activities; (ii) accreditation and registration for attendance at meetings of the Company as well as registration and recording of the interventions and voting at the meeting; (iii) sending communications and social documentation; (iv) payment of dividends; (v) exercise of the right of withdrawal or of any other right connected to the corporate relationship; (vi) statistical activities. The legal basis for the processing is the contract; therefore, pursuant to current legislation, it is not necessary to acquire a specific consent for the processing of data.

In addition to the aforementioned purposes, the aforementioned data may be processed to fulfill the obligations established by law, regulations or European Union legislation. In this case the legal basis is constituted by the obligation of the law and likewise it is not necessary to acquire a specific consent for the processing of data.

Retention period of your data

The Company will retain your personal data until the conclusion of the contract and thereafter for the period of 10 years (term beyond which the rights arising from the contract will be prescribed), as well as for the period established by law for administrative, management purposes of any complaints/disputes in civil, administrative and/or criminal matters. The audio/video recordings, once the recording is completed, will be deleted.

Access and data migration

The Company can communicate your personal data to:

- Companies of the Group, in order to carry out control activities;



- third parties (i.e. credit institutions, professional firms, consultants, auditing firm, etc.) carrying out activities in outsourcing on behalf of the Owner, in their qualities as external managers of the treatment, or as autonomous owners.

- Judicial authorities, Institutions and/or public Authorities (Borsa, Consob, etc.), as well as those subjects to whom the communication is mandatory by law. The abovementioned subjects will treat the data in their quality of autonomous data controllers.

Your data will not be subject to disclosure.

Personal data will be transferred outside the European Economic Area (EEA) only if strictly necessary and, in any case, in the presence of a decision by the European Commission regarding the adequacy of the level of data protection present in the State of destination or on the basis of appropriate guarantees provided for in articles 46 and 47 of the Regulations.



Your Rights

According to the processed Data the Company guarantees the possibility of:

- obtain confirmation of the existence or lack of your personal data and their copy in intelligible form;
- obtain the updating, correction or integration of your data;
- request the deletion of your data, within the terms permitted by law, or request to be anonymised;
- reject, in whole or in part, for legitimate reasons, the processing of your personal data;
- limit the processing, in case of violation, request for rectification or opposition;
- request the portability of electronically processed data, provided on the basis of consent or contract;
- withdraw the consent to your data processing, if required.

We inform you that the Company undertakes to respond to your requests within one month, except in case of particular complexity, when it may take up to 3 months. In any case, the Company will explain the reason of the delay of more than one month from your request.

The outcome of your request will be provided in written or in electronic format. In case you request the correction, the cancellation and the limitation of the treatment, the Company undertakes to communicate the results of your requests to each of the recipients of your data, unless it is proved to be impossible or involves a disproportionate effort.

We remind you that the withdrawal of consent does not affect the lawfulness of the treatment accomplished before.

Modification and updating of the policy

This information is updated as of today. The Company informs you that it could make changes to the policy text and that, in any case, the constantly updated version can be consulted on the Company's website <https://www.primaindustrie.com/it/information-for-the-shareholders/> in the appropriate section dedicated to shareholders.