

Privacy Notice

under the article 13 of General Data Protection Regulation (“GDPR”)

In addition to the information provided through the notice signs placed near the areas under video surveillance at the Tinexta Group headquarters located in Via Wittgens No. 2, Vetra Building, Milan (“**Video Surveillance System**”), we hereby inform You that:

1. DATA CONTROLLER

For the purpose of the GDPR, each company of the Tinexta Group may collect and record Your images/videos using the Video Surveillance System, if You are located in their respective offices/spaces at the aforementioned headquarters (hereinafter, each company referred independently as “**Company**” or “**Controller**”). The corporate details of each Company, acting as an independent data controller, are provided in **Annex 1** to this Privacy Notice.

2. DATA PROTECTION OFFICER

Each Company has appointed a Data Protection Officer (“**Data Protection Officer**” or “**DPO**”).

You can contact the DPO, *via* mail, at the following certified electronic mail address: dpo_tinexta@legalmail.it. Alternatively, You can write by postal mail at the following address: Data Protection Officer - Tinexta S.p.A., Piazza Sallustio n. 9, 00187 - Rome (RM).

3. DEFINITION OF PERSONAL DATA AND TYPE OF PROCESSING

According to the GDPR, a personal data means “*any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person*” (the “**Data**”).

Through the Video Surveillance System installed for the purpose of protecting property and other assets of each Company, the Controller may collect and process the following categories of Your Data:

- i. images/videos;
- ii. date and time of recording;
- iii. location.

The use of the Video Surveillance System will comply with the current regulations and laws, balancing the principle of safeguarding dignity with the purpose of the protection of property and other assets of the Company.

If You are an employee and/or a collaborator of the Company, the use of the Video Surveillance

System will also comply with the provisions of the Italian Workers' Statute pursuant to the article 4, paragraph 3, of the Italian law n. 300/1970. For this purpose, we clarify that the Video Surveillance System is not installed for the purpose of remote monitoring of workers' activities, but solely for the purpose mentioned in the following paragraph 4.

In any case, the Controller ensures that the information collected and used is relevant to the intended purpose, and the processing does not result in an invasion of your personal sphere.

4. PURPOSE OF THE PROCESSING AND LAWFUL BASIS

a. Protection of property and other assets of the Company

Each Company may process your data for the purpose of protecting the company's property and assets, as well as for defensive and investigative needs in the event of unlawful activities. Therefore, the processing is necessary to pursue the legitimate interests of the Company and will be based on the lawful basis as regulated in Article 6, paragraph 1, letter f) of the GDPR.

5. COMMUNICATION OF THE DATA TO THIRD PARTIES LOCATED IN THE UNION EUROPEAN ECONOMIC AREA

The Controller may communicate Your Data to third parties who provide services that are necessary, functional or otherwise related to the above-mentioned purpose.

Your Data may be communicated to third parties that offer auxiliary services including, for instance, technology providers, who will process Your Data, as data processors. The Controller maintains an updated list of data processors, which is available upon request.

The Controller may also communicate your Data to third parties if such disclosure is required by law and/or Public Administrations. In the event of requests received by the Company from the Public Authority within the scope of their investigative and crime prevention powers, your Data may be disclosed to these Authorities.

6. INTERNATIONAL TRANSFERS

The Controller will not transfer Your Data outside the Union European Economic Area.

7. DATA RETENTION

The Controller will retain your Data for a period of 5 (five) days, starting from the collection/recording of Your Data through the Video Surveillance System. In the case of specific requests from the Judicial Authority and/or other public authorities, Your Data may be retained for an extended period, corresponding to the time necessary to comply with requests from these Authorities.

8. YOUR RIGHTS UNDER THE DATA PROTECTION LAW

During the period when the Controller may process your Data, You, as a data subject, can exercise the following rights as regulated in the GDPR:

- You have the right to obtain confirmation if the Company is processing Your Data and, if so, the right to receive the information connected to this processing;
- if applicable, you have the right to obtain the cancellation of your Data, except in cases where your Data may be required by public authorities and must, therefore, be retained;
- under certain conditions, You have the right to obtain the restriction of processing concerning your Data;
- in certain circumstances, you have the right to obtain the data portability and the transmission of your Data to a different controller;
- where applicable, you have the right to object to the processing of your Data based on the lawful condition of legitimate interest, unless there are overriding legitimate interests of the Controller.

You can exercise the rights mentioned above by contacting the DPO at contact details provided. We remind you that, regarding the recorded images, the right of updating, rectification, or integration is not practically applicable due to the intrinsic nature of the collected data, as they are real-time images and cannot be rectified by the Controller. The exercise of your rights as a data subject is free of charge under Article 12 of the GDPR.

9. CLAIMS TO THE DATA PROTECTION AUTHORITY

If You want to lodge a complaint about the way in which your Data is processed by the Controller, You have the right to lodge a complaint directly with the Supervisory Authority.

Annex 1

- 1) **Tinexta S.p.A.**, with registered office at Rome (RM), Piazza Sallustio n. 9, 00187, VAT n. 10654631000, in the person of its *pro-tempore* legal representative;
- 2) **InfoCert S.p.A.**, under the direction and coordination of Tinexta S.p.A., with registered office at Rome (RM), Piazza Sallustio n. 9, 00187, VAT n. 07945211006, in the person of its *pro-tempore* legal representative;
- 3) **Warrant Hub S.p.A.**, under the direction and coordination of Tinexta S.p.A., with registered office at Correggio (RE), Corso Mazzini n. 11, 42015, VAT n. 02182620357, in the person of its *pro-tempore* legal representative;
- 4) **Tinexta Cyber S.p.A.**, under the direction and coordination of Tinexta S.p.A., with registered office at Roma (RM), Piazza Sallustio n. 9, 00187, VAT n. 15971011000, in the person of its *pro-tempore* legal representative;
- 5) **Queryo Advance S.r.l.**, under the direction and coordination of Tinexta S.p.A., with registered office at Quartu S. Elena (CA), Via Sorrento n. 6, 09045, VAT n. 03570580922, in the person of its *pro-tempore* legal representative;
- 6) **Forvalue S.p.A.**, under the direction and coordination of Tinexta S.p.A., with registered office at Milano (MI), Via Meravigli n. 7, 20123, VAT n. 03176511206, in the person of its *pro-tempore* legal representative;
- 7) **Visura S.p.A.**, under the direction and coordination of Tinexta S.p.A., with registered office at Roma (RM), Via Giacomo Peroni 400, 00131, VAT n. 05338771008, in the person of its *pro-tempore* legal representative;
- 8) **Yoroi S.r.l.**, under the direction and coordination of Tinexta S.p.A., with registered office at Roma (RM), Piazza Sallustio n. 9, 00187, VAT n. 03407741200, in the person of its *pro-tempore* legal representative;
- 9) **Corvallis S.r.l.**, under the direction and coordination of Tinexta S.p.A., with registered office at Padova (PD), Viale della Regione Veneto n. 18, 35127, VAT n. 05335180286, in the person of its *pro-tempore* legal representative.