

PRIVACY POLICY

pursuant to Article 13 of EU Regulation 2016/679

Pursuant to Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of personal data (hereinafter the "Regulation" or "GDPR"), Markbass S.p.A. has prepared this privacy policy in order to inform its investors of the methods by which their personal data are processed.

1) Identity and contact details of the Data Controller and Data Protection Officer ("DPO")

The Data Controller pursuant to Articles 4 and 24 of the Regulation is Markbass S.p.A., Via Po, no. 52, postcode 66020, San Giovanni Teatino (CH), VAT no. IT01927720696.

You may contact the Data Controller by writing to the above address or by sending an e-mail to the following address: privacy@markbass.it.

Markbass's DPO is Flavia Ciccotelli, email: flavia.ciccotelli@gmail.com

2) Purposes of processing

The personal data provided to the Data Controller at the time of purchase of company shares, and retained for the entire period during which the investor remains a shareholder, are processed exclusively for the following purposes:

- 1) completing the purchase of shares;
- 2) managing the shareholding;
- 3) providing investors with information on activities undertaken or intended to be undertaken;
- 4) convening ordinary and extraordinary shareholders' meetings;
- 5) pursuing corporate statutory purposes;
- 6) complying with legal obligations, including anti-money laundering obligations;
- 7) safeguarding the interests of the Data Controller, including in judicial proceedings.

3) Legal basis for processing

The legal basis for processing for the above purposes is compliance with the obligations laid down by statutory and/or regulatory provisions, and in particular those provided for by the GDPR, Article 6(1):

- b) under which "processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract" (for the purposes referred to in points 1–5 of section 2 above); and/or

- c) under which "processing is necessary for compliance with a legal obligation to which the controller is subject" (for the purposes referred to in points 5–6 of section 2 above); and/or
- f) under which "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject" (for the purpose referred to in point 7 of section 2 above).

4) Categories of personal data processed

The Data Controller will process the following data: first name, last name, tax identification code, date and place of birth, place of residence, telephone number, e-mail address, certified e-mail address (PEC), bank account details.

5) Methods of data processing

In relation to the purposes indicated above, the processing of personal data will be carried out by means of manual, electronic and telematic tools solely for the achievement of the above purposes and, in any case, in a manner that ensures their security and confidentiality.

6) Recipients and categories of recipients of personal data

The processing of the personal data you provide may be carried out by persons expressly and specifically designated by the Data Controller as processors (Article 28 GDPR) or as authorised persons (Article 29 GDPR).

The data provided may also be processed directly by the Data Controller and may be disclosed to third parties where such processing is necessary to comply with legal obligations. For this purpose, the data may be disclosed to external companies or professionals whose collaboration the Data Controller may use for the purposes indicated in this policy, including accountants, labour consultants, legal advisors, and providers of digital platforms used.

The data may be disclosed, in order to fulfil contractual and legal obligations, to postal offices, shipping agents and couriers for the sending of documentation, as well as to banking institutions for accounting management arising from the performance of the contract, to Public Authorities as provided by law, and to third parties for the provision of IT services or archiving services.

Data may also be disclosed to financial markets for the regular conduct of their activities and for stock exchange listing purposes, as well as to competent Authorities.

The personal data of the data subject are not subject to dissemination; that is, the Data Controller will not make them known or available in any way to unidentified parties.

7) Transfer of personal data to a third country or international organisation

Investors' identifying data will not be transferred to any foreign country.

8) Data retention period

Investors' personal data are retained for the entire period during which the investor holds shares in the company, up to a maximum period of 10 years from the date of their sale pursuant to Article 2220 of the Italian Civil

Code, without prejudice to the Data Controller's right to safeguard its rights in judicial proceedings, and subject to the time necessary to obtain full payment / the conclusion of any proceedings brought / the time-barring of the claim.

Upon expiry of the retention period, your data will be deleted or rendered anonymous.

9) Security measures adopted

The Data Controller adopts:

- Organisational security measures: preparation of adequate protocols to prevent potential data breaches (e.g. appointment instruments for data processors, Data Breach Policy, Data Retention Policy, rights management procedures); controlled access to archives; training for employees and collaborators;
- Technical security measures, including: authentication (personal account and periodic password renewal); automatic operating system updates; authorisation; regular backups; antivirus; server in a locked room accessible only to authorised employees.

10) Rights of the data subject

Pursuant to Articles 15 et seq. of the Regulation, you have the right to request from the Data Controller:

- Access: the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you are being processed, and if so, what their characteristics are;
- Rectification: the right to request the correction of your data without undue delay and to obtain the completion of incomplete personal data, including by providing a supplementary statement;
- Erasure of your personal data without undue delay;
- Restriction: the right, under certain conditions, to prevent any type of operation on marked data, except for storage, where you contest the accuracy of the data, the processing is unlawful, the data is needed for the establishment, exercise or defence of legal claims, or you have objected to the processing pending verification;
- Objection: if your data are processed for the performance of a task in the public interest or for the purposes of legitimate interests, you have the right to object to such processing at any time, unless the Data Controller demonstrates compelling legitimate grounds for the processing which override your interests;
- Data portability: the right to receive your data in a structured, commonly used and machine-readable format and to transmit them to another controller where processing is based on consent or carried out by automated means;
- Where processing is based on Article 6(1)(a) or Article 9(2)(a) of the Regulation: withdrawal of consent at any time without affecting the lawfulness of processing based on consent given before its withdrawal.
- Without prejudice to any other administrative or judicial remedy, a data subject who considers that the processing of their personal data infringes the GDPR has the right to lodge a complaint with a supervisory authority, in particular in the Member State of their habitual residence, place of work or place of the alleged infringement pursuant to Article 77 of the GDPR (the Italian supervisory authority is the Garante per la protezione dei dati personali).

To exercise the rights listed above, the data subject may contact the Data Controller at the contact details indicated in point 1 of this policy.

11) Processing of personal data for a purpose other than that for which they were collected

Where the Data Controller intends to further process personal data for a purpose other than that for which they were collected, it will, prior to such further processing, provide the data subject with information regarding that different purpose and any other relevant information pursuant to Article 13(2) of the Regulation.

12) Whether the provision of personal data constitutes a legal or contractual obligation, or a requirement necessary to enter into a contract, and the possible consequences of failing to provide such data

The communication of personal data by you and its subsequent processing by the Data Controller are necessary for the establishment, continuation and proper management of the relationship in question; such communication must therefore be considered mandatory.

Should you refuse to provide the personal data requested, the Data Controller may be unable to finalise and manage the existing contractual relationship with you.

13) Amendments

The Data Controller reserves the right to update this Policy at any time and to inform users thereof through the most appropriate means. For any further information or queries, please contact the Data Controller at the contact details indicated in point no. 1.