

Information on personal data processing relating to the Shareholders' meeting of INWIT S.p.A.

Pursuant articles 13 and 14 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR"), INWIT S.p.A., as controller of Processing, provides the present Information on Personal Data Processing relating to the Shareholders' meeting of INWIT S.p.A. of 6 April 2022 ("Shareholders' meeting").

1. Personal Data Controller

The controller of Processing is INWIT S.p.A. ("**Controller**") with registered office in Milan (20123) at Via Gaetano Negri n. 1. The Data Protection Officer, appointed by the Controller, may be contacted by e-mail at the following address: dpo@inwit.it

2. Purposes of Processing

The Controller will process the personal data you provide for:

- the performance of the mandatory obligations in relation to the process of managing and organizing your participation in the Assembly in accordance with the procedures provided for in the notice of communication. This processing is carried out in compliance with the legal obligations provided for in this matter by the Data Controller, pursuant to art. 6, par. 1, lett. c) of the GDPR, in order to guarantee the exercise - also by means of subjects, such as the Designated Representative Computershare S.p.A. - of the rights provided for by the applicable legislation in relation to the conduct of the Shareholders' Meeting;
- meet internal administrative, financial and accounting needs. This processing is carried out in the legitimate interest of the Data Controller pursuant to art. 6, par. 1, lett. f) of the GDPR;
- exercise and ascertain a right and satisfy any defensive needs in court as well as in out-of-court matters. This processing is carried out in the legitimate interest of the Data Controller pursuant to art. 6, par. 1, lett. f) of the GDPR;
- to fulfil any further regulatory obligation incumbent on the Data Controller. This processing is carried out in compliance with a legal obligation to which it is subject pursuant to art. 6, par. 1, lett. c) of the GDPR.

The communication of your personal data is optional, however, the lack or partial communication of personal data may make it impossible for you to participate in the Shareholders' meeting and, for the Controller, the impossibility of fulfilling the obligations prescribed by current legislation.

3. Method and logic of the processing

The processing of data is carried out manually, in automated mode and/ or through computer and telematic tools, with logic related to the purposes indicated above and, in any case, in order to ensure the security and confidentiality of data.

Your personal data, including those relating to the audio and video recordings of the Shareholders' meeting and the transcription in real time by means of computerized electronic stenotype, will be collected and processed both electronically and on paper - with the help of automated means - and will be stored in a form that allows the identification of the data subject.

4. Retention of personal data

Your personal data will be stored, in compliance with the principles of minimization and limitation of storage, for the time strictly necessary to achieve the aforementioned purpose and in any case for a period not exceeding 10 years from the date of the Shareholders' meeting.

This period, in addition to being consistent with the rules governing the appeal of the resolutions of the Shareholders' Meeting, takes into account the requirements of the Issuers' Regulations approved by CONSOB by Resolution No. 11971 of 14 May 1999 on the Publication of regulated information on the issuers' website.

After the period necessary for the pursuit of this purpose, personal data will be permanently deleted or made anonymous.

The Controller reserves the right, in any case, to keep, if necessary, your personal data also to meet any defensive needs and to comply with any applicable regulatory obligations.

5. Scope of communication and dissemination of data

Personal data will be processed by Controller employees who have been authorised to process it. For the same purposes, personal data may be processed by third parties or other parties that carry out activities on behalf of the Controller.

These subjects will be identified as independent controllers or designated processors pursuant to art. 28 GDPR.

Finally, for the same purposes, personal data may be disclosed to bodies, institutions and authorities in accordance with the applicable legislation.

6. Rights of the data subject

We inform you that as a data subject you have the right to lodge a complaint with the Authority and to exercise the rights provided for in art. 15 e subsequent of the GDPR, which may be enforced by making a special request to the Controller.

In particular, in the cases and in the ways provided for by current legislation, you may exercise the following rights:

Art. 15 - Right of access by the data subject - The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data.

Art. 16 - Right to rectification - The data subject shall have the right to obtain from the controller without undue delay 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.

Art. 17 - Right to erasure - The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay.

Art. 18 - Right to restriction of processing - The data subject shall have the right to obtain from the controller restriction of processing.

Art. 20 - Right to data portability - The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

Art. 21 - 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 based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller



shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

These rights can be exercised through specific request to be addressed by registered letter to the Controller or by sending an email to dpo@inwit.it.