

INFORMATION PROVIDED PURSUANT TO ARTICLES 13-14 OF GDPR 2016/679

The processing will be based on principles of fairness, legality, transparency, and protection of your privacy and your rights.

Pursuant to Article 13 of GDPR 2016/679, we provide the following information:

A - Personal Data

Your personal data (name, surname, identification document details and a copy of it, telephone number, email address, etc.) will be provided at the time of your subscription, depending on the type of membership requested.

FLEXILIGNER, as the data controller of your personal data, informs you of its use and your rights, so that you may consciously express your consent, where required, and exercise the rights provided by the General Data Protection Regulation (European Regulation 679/2016, hereafter: "the Regulation").

Your personal data (also provided by third parties or, within the limits of the law, from public lists) may be processed for the following expressly stated purposes:

1. **Legal obligations**, to comply with obligations established by law, by regulations, by European Union legislation, or by instructions issued by authorities authorized by law or competent supervisory or control bodies (in this case, your consent is not required, as data processing is related to compliance with such obligations/instructions). Data processed for legal purposes includes those related to tax regulations or anti-money laundering registers.
2. **Contractual and administrative-accounting purposes**, to fulfill obligations deriving from contracts of which you are a party, or to fulfill, before the conclusion of the contract, your specific requests, including through remote communication techniques such as a dedicated telephone call center (in this case, your consent is not necessary, as the data processing is functional to managing the relationship or fulfilling the requests). These also include purposes related to the protection of mutual interests in judicial or tax matters or for other legal obligations, such as keeping an anti-money laundering register if applicable.
3. **Direct commercial purposes and profiling**, i.e., to provide you with information and send you informational, commercial, and advertising materials (also through remote communication techniques, such as postal mail, phone calls, automated calling systems, fax, email, SMS or MMS messages, or other types) on products, services, or initiatives of the company, to promote them, conduct direct sales actions, perform market research, verify the quality of products or services offered to you (also through phone calls or sending questionnaires), optimize the offer (also through focused and selected analyses), make commercial communications, conduct statistical research, and apply one or more profiles (for the purpose of making appropriate commercial decisions or to analyze or predict your personal preferences, behaviors, and habits for commercial purposes). (In this case, your consent is optional and does not affect the continuation of the relationship with the company).
4. **Indirect commercial purposes**, i.e., by communicating your data to third parties so that they can carry out their own autonomous commercial activities as indicated in point 3 above. (In this case, your consent is optional and does not affect the continuation of the relationship with the company).
5. **Post-commercial purposes**, i.e., to further investigate, after the termination or revocation of the relationship with the company, the reasons for the interruption. (In this case, your

consent is optional and does not affect the continuation of the relationship with the company).

6. **Sensitive data**, i.e., personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data concerning health, or data concerning a person's sex life or sexual orientation (Article 9 of the Regulation) or data related to criminal convictions and offenses or related security measures (Article 10 of the Regulation). Such data may be processed only with your explicit written consent if one of the reasons indicated in Article 9(2) and Article 10 of the Regulation exists. Consent is voluntary, but refusal to consent may hinder the performance of one or more activities you requested from the company that specifically concern tasks requiring the processing of such data.

Consent to the processing of your data may be binding to conclude contracts with the data controller or third parties. Only the data necessary for the performance of the task are considered binding to conclude the contract.

Consent may be freely granted or denied for non-essential data, such as those (for example) collected for profiling, commercial communications, or marketing.

Your data may be transferred to third parties for the purposes declared by the data controller, and in this case, the controller will collect your explicit consent for the new purposes if necessary according to current regulations.

B - METHOD OF DATA PROCESSING

The processing of your data is carried out by collecting it through manual or electronic tools, and its storage is done using suitable electronic and automated tools, in a manner strictly related to the purposes indicated above. Where you have provided consent, the processing may also involve profiling or data comparison.

The company has adopted technical and organizational measures to prevent and limit the risk of loss, deterioration, and theft of your data.

These computerized techniques are suitable to ensure, within a reasonable time, the restoration of data in the event of a "data breach".

The processing is carried out in such a way as to ensure the security, protection, and confidentiality of your data in accordance with current legislation and through computerized procedures, subject to encryption and protection with "secure" credentials.

Within the company, your personal data may be known to responsible parties or those authorized for processing:

- Employees, executives, directors, or shareholders of the company who hold administrative, collaborative, or commercial roles within the company's structure. This personnel has been provided with adequate training and instructions by the company to protect the storage, maintenance, updating, and security and confidentiality of your data. Consent for processing by such personnel is not required, as it is inherent to the legal requirements.

Outside the company, your data may be processed by:

- a) Collaborators under a non-employee contract, working outside the company structures, but bound by specific confidentiality agreements and subject to supervision regarding the company's code of conduct;
- b) External consultants (lawyers, doctors or chartered accountants, engineers, architects, labor consultants, or other professionals), who carry out technical, business support tasks on behalf of the company.

The company may communicate or transfer your data to certain third parties, even foreign ones, who will use the data as independent data controllers, unless they are appointed by the company as "processors" for specific processing activities.

You have the right to request and obtain a list of third parties to whom your data is transmitted.

Consent is required for the transmission of data to third parties, but if denied, the company may not be able to provide the requested services or fulfill its obligations to you.

The data controller uses information systems owned by specialized third parties external to the company, but who become joint controllers of the data with the company, and relationships with them are governed by specific contractual agreements.

The data controller may delegate the processing of your data to other sub-processors, who will be instructed on the proper processing of the data, and in this case, you will be promptly notified, even through the update of the "privacy policy" on the company's website.

This form provides the following information where applicable:

1. Data of the controller and representative;
2. Data of the data protection officer;
3. Purpose and legal basis for processing;
4. Data recipients;
5. Intention to transfer data abroad;
6. Duration of the storage period or criteria for determining the duration;
7. Right of access, rectification, erasure, objection to processing, portability;
8. Right to withdraw consent if possible, except for legal obligations;
9. Possibility to file complaints with the supervisory authority (Garante);
10. Possibility to deny consent and consequences if the data are mandatory for contract execution or legal compliance;
11. Existence of automated decision-making processes and the right to human intervention in decision-making.

Your data will be retained by the controller, respecting the purposes provided, for the time necessary to carry out the ongoing relationship and to ensure mutual protection in judicial matters, as well as to fulfill legal obligations, including tax-related ones. Data not necessary for these final purposes will be removed within three years from the conclusion of the professional relationship or, in any case, within the maximum period provided by the right to be forgotten, or at your request in a shorter time if not in conflict with the controller's rights.

Regarding profiling, the company declares the following: IT DOES NOT PERFORM PROFILING.

C - DATA SUBJECT RIGHTS

You may, at any time, exercise the following rights explicitly granted to you by the Regulation:

- a) Right to file a complaint at any time with the national authority (Garante for the protection of personal data) if you believe your rights have been violated.
- b) Right to have your data always accurate and updated; therefore, you may notify or request updates at any time.
- c) Right to withdraw consent for the processing of data, provided it is not prevented by legal provisions or the need to protect the controller's rights, even in judicial matters. In any case, the request for withdrawal triggers the right to limit the processing.
- d) Right to access your data processed by the controller through a written request, also electronically. You must provide proof of your identity, possibly through access to our databases using credentials uniquely linked to you. You have the right to free access once, but may be charged for subsequent requests. You have the right to receive a response within thirty days and to obtain your data in printable formats.
- e) Right to rectification and updating of your data, and you may at any time request updates or

corrections if the data in our possession are found to be outdated or incorrect.

f) Right to erasure of your data, provided it does not concern data that the controller must retain due to specific legal obligations such as, for example, obligations arising from tax, anti-money laundering, or rights protection in contentious matters.

g) Right to have your data retained but not processed beyond what is necessary to resolve disputes over the accuracy, legality of processing, or the controller's right to delete your data or in case you object to the processing.

h) Right to be informed of any modification or deletion of your data and to oppose such modification or deletion.

i) Right to transfer your data – retained and processed electronically – to another operator within the limits indicated by the Regulation, provided it is technically feasible, in a way that allows easy reading and acquisition by third parties.

j) Right to object to the processing of your data, profiling, the use of data for direct marketing, or profiling for public interest, scientific, historical, or statistical research purposes.

k) Right to request that before making any binding decision through automated methods, your position is reviewed by a human operator who makes a merit-based assessment.

l) Right to be consulted during the evaluation of security procedures for the processing and protection of your data.

The company may, in certain circumstances, process your data to communicate with you about commercial, informational, or educational initiatives (i.e., newsletters). In this case, your consent must be explicit and separate from other forms of consent, and you may withdraw your consent for this purpose at any time.

D - IDENTIFICATION OF PARTIES INVOLVED IN PROCESSING

1. Data Controller: FLEXILIGNER srl – VAT No. 15139331001, with registered office at Via Delle Genziane n. 13/E – 00012 Guidonia Montecelio (RM), represented by its legal representative pro tempore Andrea Saletta.
2. Company hosting data storage cloud:
3. DPO (if required): Andrea Saletta, legal representative of FlexiLigner srl.

E - EXERCISING YOUR RIGHTS

Your requests can be submitted in writing to:

1. The company's address (see section "D");
2. The email address: info@flexiligner.it.

AUTHORIZATION FOR THE PROCESSING OF PERSONAL DATA PURSUANT TO EU REG. NO. 679/2016

The undersigned, born on, in, Tax Code, residing in, at Street, having acquired the information provided by the data controller:

- Expresses their consent to the processing of common data for the purposes indicated in the above privacy notice:

☐ I give consent – ☐ I deny consent

- Expresses their consent to the processing of personal and sensitive data for the purposes indicated in the above privacy notice:

☐ I give consent – ☐ I deny consent

Location and Date:

Legible Signature