

## Information to Shareholders pursuant to the laws regarding the protection of Personal Data

Dear Shareholder,

in pursuance to Articles 13 and 14 of Regulation 2016/679/UE (General Data Protection Regulation – hereinafter as “GDPR”) Digital Bros S.p.A., hereinafter as “DB”, provides you with the following information regarding the processing of your personal data in relation to your position as DB’s shareholder.

### **1) Categories of personal data**

DB acquires and processes your following personal common data referred to in art. 4, point 1, GDPR: general personal information (name, surname, sex, date and place of birth, fiscal code); contact details (wireline and/or mobile phone number, e-mail address, address of residence and domicile), access and identification data (stock filing number, password) for the use of the Telematic Service for the management of DB shares; payment data (IBAN); data relating to identification documents.

### **2) Purposes for which processing of personal data is necessary and related legal basis**

Your personal data, that you have provided to DB also via financial institutions and intermediaries, shall be processed for the following purposes: **a)** registration in the shareholders’ register and related activities; **b)** creation and updating of the mailing list (name, address and any other indications) for the distribution of communications and corporate documents; **c)** certification and registration of attendances at shareholder meetings of the Company; **d)** registration and putting on record of interventions and votes made during shareholder meetings; **e)** dividend payments; **f)** exercise of withdrawal rights or, in any case, any and all rights for the exercise of which, in compliance with law, the Company needs to legitimize beforehand; **g)** evaluation on the Company’s shareholders’ structure or participation in shareholder meetings.

Furthermore, in the event you provide your personal data for the exercise, via web, through the website <https://digitalbros.com.it/>, of shareholder rights as indicated in the Consolidated Law on Financial Intermediation (Legislative Decree no.58/1998) and namely to (i) ask questions before the Shareholders’ Meeting (ii) notify DB of any proxies granted to your Representatives; (iii) exercise votes before shareholder meetings using electronic means, DB shall process your personal data in order to enable you to exercise such rights.

Your personal data may be also processed to fulfill other obligations under laws, regulations and EU legislation and provisions issued by Authorities or by other legitimized entities.

The legal basis for the processing of your personal data for the above-mentioned purposes is the need to manage your relationship as DB’s shareholder (Article 6, paragraph 1, letter b) of the GDPR) or to fulfill the legal obligations under which the Data Controller is subject (Article 6, paragraph 1, letter c) GDPR).

Your personal data is necessary in order to achieve the above-mentioned purposes; failure to provide such data or data which is incomplete or inaccurate may result in incorrect (regulatory or towards you) fulfillments.

### **3) Storage of personal data**

DB will keep your personal data for the time indicated in the corporate policies and in any case for a period of time which does not exceed the purpose for which such data was collected or subsequently processed as well as for the period as provided by law for administrative purposes, the management of any claims or disputes or for criminal purposes.

### **4) Procedures and logic applied to data processing**

The processing of personal data shall be carried out manually and/or by electronic or automated means with data organization and processing logics relating to the purposes described above, and, in any event, in such a way as to ensure the security and the confidentiality of the data itself.

### **5) Controller, Data Protection Officer and Persons authorized to process personal data in DB**

The Controller of your personal data is Digital Bros S.p.A, with registered offices in via Tortona 37, 20144 Milan. DB has appointed a Data Protection Officer, who can be contacted by writing to the following address of DB: via Tortona n. 37/3B, 20144 Milan; or by sending an email to: [dpo@digitalbros.com](mailto:dpo@digitalbros.com). The

updated list of the contact details of the Data Protection Officer may be consulted by clicking on the “Privacy” link on the [www.digitalbros.com](http://www.digitalbros.com) website.

Your personal data shall be processed by DB employees of the Financial Office Department; such employees have been appointed persons authorized to process personal data and have received adequate operating instructions in such regard.

**6) Categories of third parties to whom personal data may be communicated as Data Controllers or who may acquire such data as Data Processors**

In addition to DB employees, your personal data may be processed by third parties, including companies of the Digital Bros Group, to whom DB assigns activities and services (or part of them) for the purposes referred to in point **2)** above. Such third parties may also be established abroad, in EU and non EU countries, in this latter case the data transfer is made on the basis of a decision by the European Commission regarding the adequacy of the level of data protection of non EU countries or on the basis of appropriate and suitable safeguards as provided by articles 46 or 47 of the GDPR (for example signing of standard data protection clauses adopted by the European Commission) or other conditions for the lawfulness of the transfer as provided by article 49 of the GDPR. Such third parties will act as independent Controllers or will be appointed as Processors and they are included in the following categories:

- a)** Members of the Board of Directors and Statutory Auditors of the Company;
- b)** Companies or persons appointed for the distribution of corporate documents;
- c)** Companies or persons appointed for the management and maintenance of information systems;
- d)** Independent Auditors;
- e)** Companies/Service centers for keeping and updating the shareholders' register and related activities;
- f)** Companies/Service centres, professional firms or advisors for advice and assistance in corporate operations, in the organisation/management of shareholder meetings and related activities;
- g)** Companies or authorised Centers for banking services and/or credit Institutions for the transmission of data for the transfer of securities and banking arrangements (e.g. dividend payments);
- h)** Promoters of solicitation of proxies for participation in Shareholder meetings for cases as provided by law;
- i)** Institutions and/or Public Authorities (Courts, Stock Exchange, Consob, etc.) for compliance with specific obligations of law/regulations.

Furthermore, your personal data may be disclosed to the financial market in compliance with current provisions of law and CONSOB regulations.

**7) Right of access to personal data and other rights**

You have the right to access your data at any time and to exercise the other rights provided for in Articles 15 to 22 of GDPR (e.g. request the source of your personal data, the rectification of inaccurate and incomplete data, the restriction of processing, the erasure and the right to be forgotten, data portability as well as object to the processing of your personal data on legitimate grounds) by contacting the number +39.02.413031 or by sending an email to: [dpo@digitalbros.com](mailto:dpo@digitalbros.com). Finally, you have the right to lodge a complaint with the Italian Data Protection Authority.