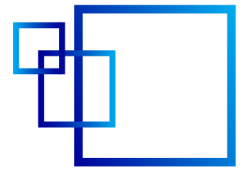


Privacy Management Policy

2023 March

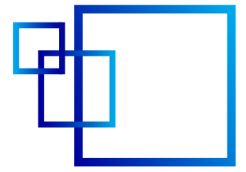


The Rai Way policy on matters concerning the protection of the personal data ("Privacy") of its employees and representatives as well as its suppliers and third-party customers respects the applicable legal provisions - in particular, Regulation (EU) 2016/679, General Data Protection Regulation ("GDPR") and Italian Legislative Decree no. 193/2006 as amended and supplemented ("Privacy Code") - both in organisational terms and in relation to security measures. Therefore, the processing of personal data at corporate level is based, in particular, upon the principles indicated in Article 5 of the GDPR, guaranteeing that those personal data are:

- processed lawfully, fairly and in a transparent manner in relation to the data subject; collected, processed, shared and stored in a lawful, correct and transparent way to protect the data subject, even in cases of data transfer to third parties; it is specified that in cases of sharing data with third parties, appointed as Data Processors, Rai Way requires them to comply with obligations consistent with the internal procedural provisions on the protection of personal data adopted by Rai Way itself; Rai Way adopts a specific procedure aimed at regulating the methods of carrying out checks on data processor pursuant to art. 28 of Regulation (EU) 2016/679; Rai Way, in accordance with the aforementioned procedure, provides for the execution of checks by requesting information and documents to the data processor, to be carried out within the times and in the manner indicated in the aforementioned procedure; without prejudice to the above, Rai Way does not rent, sell, or provide personal data to third parties for purposes other than completing transactions/services;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- obtained from the data subject in a lawful and transparent way, requesting, where necessary, the express consent as required by art. 7 of the GDPR;
- accurate and, where necessary, kept up to date;
- Rai Way guarantees the data subject the right to access, modify and delete personal data at any time and takes the reasonable steps to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are deleted or rectified without delay; to exercise the aforementioned rights, the data subject may contact the Rai Way by sending an e-mail to tutelaprivacy@rairway.it;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed or for the fulfilment of a regulatory obligation; Rai Way adopts specific guidelines on the retention of personal data in order to identify the maximum retention period or, if this is not possible, the criteria used to determine this period;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures; access control mechanisms are in place on the organization platforms in order to guarantee a secure identification, authentication and authorization process through the whole account lifecycle; furthermore, Rai Way adopts the encryption by default on its systems.

In that regard, Rai Way adopts a personal data processing management model - which constitutes a reference for the possible application even by any subsidiary companies subject to the management and coordination of Rai Way - also identifying the related organisational, managerial





and control tools, with the aim of guaranteeing the correct processing and storage of data with respect to possible threats of loss of availability, integrity and confidentiality. To that end, Rai Way has established, in particular, a specific internal procedure aimed at regulating the intervention methods in all cases where a personal data breach occurs, as well as other additional internal procedural measures that require, inter alia, the implementation of a series of controls aimed at guaranteeing the protection of such data.

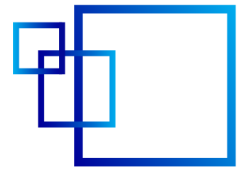
Furthermore, Rai Way ensures the management of compliance requirements with the legislation on the protection of personal data in the context of contracts and supplier management by providing for specific clauses in the contracts and related technical specifications aimed at effectively implementing the principles of protection of personal data.

In particular, it should be noted that as part of these procedures, timely information is provided to the interested data subject, where necessary, in cases of violation of personal data as well as in the event of a change in the relevant corporate procedural provisions.

The aforementioned management model is also based upon an approach that includes the following main elements:

- constant monitoring of conformity with legislative and contractual requirements;
- prevention and detection of unauthorised software;
- management of operating continuity;
- definition of proactive and reactive measures aimed at eliminating/mitigating the consequences of any breaches of personal data security;
- definition of specific managerial responsibilities for the managing personal data security with the establishment of an internal team dedicated to the examination and evaluation of all related profiles. In addition, the analysis relating to the assessment, also from the point of view of the related internal control and risk aspects, of the Privacy management model falls within the remit of the Control, Risks and Sustainability Committee, established within the Board of Directors; the Rai Way CEO is delegated for the fulfilment of privacy related requirements and rules.
- reporting of personal data security incidents;
- preparation of organisation, managerial and operational documentation in support of the personal data security policy;
- communication of the security directives and procedures in adequate, accessible and comprehensible form to operators and users;
- design and provision, for all permanent and temporary personnel of the Company, of personal data processing training courses, with a further focus on all subject authorised to process;
- systematic and periodic assessment of risks as a preventive activity;
- planning of control, measurement, analysis and improvement of the processes necessary to guarantee conformity and to improve the effectiveness of the personal data management model; in that regard, Rai Way carries out at least every two years assessment and audits by independent external experts or internal audits to assess different aspects of the model itself; the IT risk assessment activities carried out by Rai Way - at least every two years, or after a major change/incident - through specialized external suppliers make it possible to verify, through the use of automatic tools, the effectiveness of data protection and security measures. The results of the analysis give rise, if necessary, to actions to improve the security





conditions of the analysed data and information systems, whose implementation is supervised by the competent company structures.

