

FINCANTIERI S.p.A.

SHAREHOLDERS' MEETING 8 APRIL 2021

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## INFORMATION ON THE PROCESSING OF PERSONAL DATA

Dear Sirs,

with this document, drawn up under Articles 13 and 14 of EU Regulation no. 679/2016 (hereinafter also "Regulation") **Fincantieri S.p.A.** informs you, as the data subject for the processing of personal data, of the following.

### 1. Data controller for personal data processing

The data controller for the personal data requested from you (i.e. name, surname, email address, tax code) is **Fincantieri S.p.A.**, VAT no. 00629440322, with registered office in Trieste, Via Genova 1, (hereinafter also referred to as just the "**Controller**" or the "**Company**"), PEC: **privacy@pec.fincantieri.it**, e-mail: **privacy@fincantieri.it**, tel. **+39 040 3193111** fax **+39 040 3192305**.

### 2. Purpose and legal basis of the processing of personal data

As a person having the right to vote in the Shareholders' Meeting of Fincantieri S.p.A., your personal data will be processed by electronic and/or paper means, only for the following purposes and on the following legal basis:

- a) **purposes related to the management of corporate affairs:** by means, by way of example, of the following personal data processing: (i) entering your data in the Shareholders' register of the Controller; (ii) registering and recording your data when you take part to the Shareholders' Meetings of the Company; (iii) collection of the questions asked to the Company before the Shareholders' Meeting; (iv) updating the mailing list. The processing is necessary to meet the legal prescriptions provided by law due to your shareholding in Fincantieri S.p.A.;
- b) **administrative, fiscal and accounting purposes:** for the performance, by way of example, of the following processing: (i) use of your data in the accounting records and compulsory books of the Controller; (ii) use of your data to make payments (e.g. payment of any dividends). The processing is necessary to meet the legal prescriptions provided by law, as well as for the purpose of fulfilling contractual obligations, due to the position you hold;
- c) **for the purpose of managing any dispute (according to civil, criminal and labour law):** the processing is necessary to establish, exercise or defend the Controller's legal claims in court. The relevant legal basis is the legitimate interest of the Data Controller provided for in Article 6(1)(f) of the Regulation.

It should also be noted that your data will be communicated and processed within Fincantieri S.p.A. by personnel duly appointed and instructed by the Controller.

Your personal data will be processed according to the legal basis above described.

### 3. Recipients of personal data

Your personal data may be communicated, strictly in relation to and in line with the purposes set out above, to the following categories of subjects:

**FINCANTIERI S.p.A.**

**SEDE LEGALE**

Via Genova, 1 - 34121 Trieste - Italia

Tel. +39 040 3193111 - Fax +39 040 3192305

Cap. Soc. i.v. € 862.980.725,70 - Uff. Reg. Imp. Venezia Giulia - C.F. 00397130584 P. IVA 00629440322

- the service company that operates as a Service Centre on behalf of Fincantieri S.p.A. at Monte Titoli S.p.A. and is in charge of keeping Fincantieri S.p.A.'s Shareholders' register;
- the service company that provides technical and operational assistance for the management of the Shareholders' Meetings of Fincantieri S.p.A.;
- banks;
- any other parties, to whom the regulations in force provide for the obligation of communication.

The contact data of the external processors who carry out activities in the Controller's interest may be requested by you at the following PEC address: **privacy@pec.fincantieri.it**, or at the following e-mail address: **privacy@fincantieri.it**.

#### 4. Transfer of personal data to a third country or an international organisation

The Data Controller does not intend to transfer your personal data to countries outside the European Union.

#### 5. Period of retention of personal data

Your data will be kept for the entire duration of your status as a Shareholder of the Company and for the time strictly necessary for the fulfilment of legal obligations and for the pursuit of the legitimate interests of the Controller

#### 6. Rights of the data subject

We inform you that as a data subject you have the right to obtain from the Data Controller:

<b>Right of access:</b> (Article 15 of the Regulation)	confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, the right to obtain, among other things, access to your personal data and information regarding the purposes of the processing, the categories of personal data concerned and the recipients or categories of recipients to whom the personal data have been or will be disclosed.
<b>Right to rectification:</b> (Article 16 of the Regulation)	(i) rectification without undue delay of inaccurate personal data concerning you and (ii) completion of your personal data, where incomplete.
<b>Right to erasure ("right to be forgotten"):</b> (Article 17 of the Regulation)	erasure of personal data concerning you without undue delay (the Data Controller has the obligation to erase personal data without undue delay in the cases set out in Article 17 of the Regulation).
<b>Right to restriction of processing:</b> (Article 18 of the Regulation)	restriction of processing in the cases set out in Article 18 of the Regulation.
<b>Right to portability</b> (Article 20 of the Regulation)	i.e. (i) the right to receive in a structured, commonly used and machine-readable format the personal data concerning a data subject and (ii) the right to transmit such data to another data controller without hindrance by the Data Controller.

<b>Right to object for processing carried out under Article 6(1)(e) or (f):</b>  (Article 21 of the Regulation)	objection, at any time, on grounds relating to your particular situation, to the processing of personal data relating to you under Article 6(1)(e) or (f), including profiling on the basis of such provisions.
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At any time, you will have the opportunity to exercise the above rights through a formal request sent to the PEC address [privacy@pec.fincantieri.it](mailto:privacy@pec.fincantieri.it), or to the e-mail address [privacy@fincantieri.it](mailto:privacy@fincantieri.it) accompanied by an identity document.

You also have the right to **lodge a complaint with the Data Protection Authority** if you believe that the processing of your personal data breaches the provisions of EU Regulation no. 679/2016.

## **7. Nature of consent for the processing of data and consequence of failure to give consent**

The processing of personal data for the purposes referred to in paragraph 2 above is necessary to carry out specific requirements arising from legal prescriptions provided by law; failure to provide data for such purposes may result in the inability to attend Shareholders' Meetings, fulfil legal obligations and, if necessary, exercise your rights as a Shareholder.

For any further clarifications, please contact the Controller at the following PEC address: [privacy@pec.fincantieri.it](mailto:privacy@pec.fincantieri.it), or at the following e-mail address: [privacy@fincantieri.it](mailto:privacy@fincantieri.it).

The Data Protection Officer (DPO) may be contacted at the following PEC address: [privacy@pec.fincantieri.it](mailto:privacy@pec.fincantieri.it), or at the following e-mail address: [privacy@fincantieri.it](mailto:privacy@fincantieri.it).