

**Technogym S.p.A.**



**The Wellness Company**

*Register of persons with access to Privileged Information*

## 1. Foreword

### 1.1 In relation to the indications given in:

- (a) the provisions set out in article 18 of Regulation (EU) no. 596/2014 on market abuse (the “**MAR**”), which imposes the creation of a register of all persons with whom there is a relationship of professional collaboration, whether it is a permanent or other type of employment contract, and who, in performing certain tasks, have access to privileged information (the “**Register**”); and
- (b) the provisions set out in the Commission Implementing Regulation (EU) no. 347/2016 of 10th March 2016 (the “**Regulation 347**”), which contains the technical implementation rules on the precise format of the lists of persons with access to privileged information and their updating;
- (c) Section 3 of the guidelines on the “Management of privileged information” adopted by CONSOB on 13 October 2017 (the “**Guidelines**”) <sup>(1)</sup>, which recommends the creation of a register of all persons with whom there is a relationship of professional collaboration, whether it is a permanent or other type of employment contract, and who, in performing their tasks, have access to important information (“**Register of Relevant Information**” or, according to the definition of Guidelines, the “**Relevant Information List**” or “**RIL**” and, together with the Register, the “**Registers**”);

the Board of Directors of Technogym S.p.A. (the “**Company**”) has set up the Register and, on a voluntary basis, the RIL, and adopted this procedure to regulate their keeping, updating and conservation (the “**Procedure**”).

- 1.2 Annex 1 (“**Insider**” **Register Regulations**) of this Procedure contains a description of the *Insider* Register Regulations that the recipients of this Procedure are obliged to know and observe together with the Procedure for the internal management and external communication of documents and information about Technogym S.p.A. (the “**Information Procedure**”), to which this Procedure is linked.

## 2. Privileged information and Relevant Information

- 2.1 In accordance with and to the effects of art. 7 of the MAR, in this Procedure, “**Privileged information**” is considered to mean detailed information that has not been made public, directly or indirectly concerning the Company, or the financial instruments relevant to the purposes of art. 3, subsection 1, par. 1), of the MAR issued

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<sup>(1)</sup> The Guidelines – issued in replacement of Consob communication no. 602705443 of 28 March 2006 – “constitute an aid in defining the process and consequent implementation procedures aimed at applying the normative and regulatory provisions on market abuse, in particular: - the obligations laid down by the MAR and their implementation provisions; - the indications given by the ESMA [...]. The purpose of these Guidelines is also to offer [...] some detailed operating indications for implementing the European regulations, taking account of the specific features of the national institutional and operational framework. Some indications are a re-elaboration of the clarifications given by Consob within the scope of the existing regulations, suitably re-adapted to the new regulatory setting.” (see par. 1.3 of the Guidelines). The Guidelines are not prescriptive and, if disregarded, do not constitute a violation of the regulations; they “do not introduce obligations, even of an organizational type, for the issuing body in addition to those laid down by the original European legislation, considering that they simply indicate methods for complying with this legislation, the issuing body remaining responsible for the decision to comply with it (fully or partially)” (see par. 1.3.3. of the Guidelines)

by the Company (the “**Financial Instruments**”), which, if made public, could have a significant effect on the prices of the Financial Instruments or linked derivative instruments.

- (a) In accordance with and to the effects of article 7, subsection 2, of the MAR, in this Procedure, information will be considered precise if:
  - (i) it refers to a series of circumstances that already exist or that can reasonably be expected to occur or to an event that has occurred or can reasonably be expected to occur;
  - (ii) it is sufficiently specific to allow conclusions to be drawn on the possible effect of this set of circumstances or event on the prices of the Financial Instruments or linked derivative instrument.
- (b) In accordance with and to the effects of article 7, subsection 4, of the MAR, in this Procedure, information that, if made public, would probably have a significant effect on the prices of the Financial instruments or linked derivative instruments, is intended to mean information that an investor could reasonably use as one of the elements on which to base his investment decisions.
- (c) Even the intermediate stage of a long process is considered Privileged Information if it satisfies the criteria set out in this article.

2.2 In accordance with paragraph 3.1 of the Guidelines, in this Procedure, “**Relevant information**” is intended to mean any information or news that cannot yet be qualified as Privileged Information that the Company considers relevant in that it concerns data, events, projects or circumstances that continuously, repeatedly, periodically or sporadically, occasionally or unexpectedly concern directly the Company itself and that may later become confidential in nature <sup>(2)</sup>.

### **3. Natural or legal persons, associations or other bodies entered on the Registers (the “Persons”)**

3.1 The Register is made up of: (a) separate sections, one for each item of Privileged Information (the “**Single section**”); whenever a new item of Privileged Information is identified, a special new Single section is added to the Register, which contains the data only of the persons who have access to the specific Privileged information contemplated in the same section; (b) a supplementary section containing the data

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<sup>(2)</sup> Paragraph 3.1.2 of the guidelines supplies a non-exhaustive exemplary list of types of privileged information that could be of interest to an issuing body: “[...] *Information about: ownership structure, composition of the management; management incentive plans; auditing activities; capital operations; issue of financial instruments; characteristics of the financial instruments issued; acquisitions, mergers, demergers, etc.; company restructuring and reorganization; operations on financial instruments, buy-back and accelerated book-building; insolvency proceedings; litigation procedures; revocation of credit authorizations; devaluation/revaluation of activities or financial instruments in the portfolio; patents, licenses, rights, etc.; insolvency of large debtors; destruction or damaging of uninsured assets; purchase or sale of assets; management progress; variations in the expected periodic accounting results (profit warning and earning surprise); reception or cancellation of large orders; entry to new (or exit from) markets; modification of investment plans; dividend distribution policies; for banks, information that the issuing body receives from the supervisory authority during a Supervisory Review and Evaluation Process (SREP) carried out in accordance with article 97 of Directive 2013/36/EU (CRD IV).*”

concerning only the persons who have access to all the Privileged Information (the “Permanent Section”) such as: (i) the chairman of the board of directors; (ii) the managing director; (iii) the chief financial officer; (iv) the executive directors; and (v) the other persons indicated in paragraph 4.6 below.

- 3.2 The RIL is made up of: (a) separate sections, one for each item of Relevant Information (the “**Occasional section of the RIL**”); whenever a new item of Relevant Information is identified, a special new Occasional Section is added to the RIL with the data of only the persons who have access to the specific Relevant Information contemplated in this section; (b) a supplementary section with the data of only the persons who always have access to all the Relevant information, such as that indicated in paragraph 3.1 above (the “**Permanent section of the RIL**”).
- 3.3 In addition or as an alternative to the provisions set out in paragraph 3.2 above, at the discretion of the Register Manager, the RIL can be subdivided into separate sections, one for each “project”, intended as a project related to a specific operation (for example, an extraordinary operation, an acquisition operation, etc.) or a specific event, even recurrent (for example, the approval of annual and infra-annual account data), which can contain all persons with access to the information contemplated in it (the “**Occasional section of the RIL by the Project**”).

#### **4. Keeping the Register**

- 4.1 The Registers are kept in such a way as to ensure easy consultation and extraction of the data they contain and in electronic format, which guarantees at all times (i) the confidentiality of the information contained in the Registers by making sure that access is granted exclusively to the persons clearly identified who, at the Company, need such access due to their function or position; (ii) the correctness of the information given in the Registers; and (iii) access to and location of the previous versions of the Registers.
- 4.2 The Registers are kept by the manager of the Company’s Corporate Affairs department (the “**Register Manager**”). In addition to the functions indicated in other parts of this Procedure, the Register Manager makes sure that the regulations in force and this Procedure are respected and applies, maintaining the relevant evidence, the criteria adopted to keep the Registers and the methods for managing and searching for the information contained in the Registers, so as to ensure easy access, management, consultation, extraction and printing. In particular, the Register Manager is responsible, *inter alia*, for the following functions:
- (a) General supervision of the keeping of the Registers and the possibility of gaining access to all the information they contain and extracting it using all methods made possible by the system;
  - (b) Collaboration in relations with the judicial or supervisory authority following requests concerning the information contained in the Registers;
  - (c) The resolution of any doubts that may arise from the operational management of the Registers.

- 4.3 In performing his tasks, the Register Manager can use the services of collaborators working under his responsibility.
- 4.4 On his own or through delegates and without delay, the Register Manager sets up and updates the Single Sections and/or Occasional Sections of the RIL for the members of the management and supervisory bodies and the committees of the Company and the companies controlled by it in accordance with article 93 of the TUF (the “**Controlled companies**”) and the manager responsible for drawing up the company’s accounting documents.
- 4.5 Without prejudice to paragraph 4.4 above, the Register Manager enters the persons and updates the Single Sections and Occasional Sections of the RIL in relation to these Persons with the support of the company departments involved. The latter communicate to the Register Manager without delay, by e-mail or other written means that guarantees receipt of the information necessary to register the persons in each of the Single Sections and Occasional Sections of the RIL and to update their data. In particular:
- (a) The information on the employees of the Company or Controlled companies and their updates are communicated by the human resources department;
  - (b) the information concerning the consultants of the Company or the Controlled companies and their updates are communicated by the: (i) members of the management and control bodies and the committees of the Company and the Controlled companies, (ii) managers that report directly (in hierarchical and/or functional terms) to the Chairman of the Company’s board of directors or the Company’s managing director, and (iii) directors that report directly (in hierarchical or functional terms) to the directors indicated in (ii); and
  - (c) the information necessary to update Registers for the auditing company are communicated by the manager responsible for drawing up the company’s accounting documents.
- 4.6 The board of directors (that is, the person delegated by him) proceeds periodically to identify and update the Persons who have access to Relevant Information and Privileged Information on a permanent basis, to be entered in the Permanent Section or the Permanent Section of the RIL, according to the case and promptly informs the Register Manager so that he can proceed with the entry and updating.
- 4.7 The Controlled companies, through their executive directors or other delegated persons, communicate without delay, by e-mail or other written means that guarantees receipt, to the Company’s managing director (or, in his absence or impediment, the Chairman of the Company’s board of directors or, in the absence or impediment also of the latter, to the vice-chairman of the Company’s board of directors) and the Register Manager, all Relevant Information or Privileged Information on events or circumstances that occur in their field of activity. The Controlled companies appoint a reference person to ensure that the provisions of this Procedure are applied correctly, with particular reference to the obligations related to the Registers and information flows towards the Company and communicate their data to the Register Manager.

- 4.8 Any of the Persons entered in the Single Sections or Occasional Sections of the RIL or in the Permanent Section or Permanent Section of the RIL who report or discover the communication of Relevant Information or Privileged Information, depending on the case, to another party that, according to the internal provisions, is not already allowed to have access to Relevant Information or Privileged Information communicates without delay, by e-mail or other means that ensures receipt, to the Register Manager the name of this person in order to enter him or her on the Register or the RIL, depending on the case, or update his or her data.
- 4.9 The Register Manager and any delegates of his are granted access to the Registers. Following a request made to the Register Manager, access may also be granted to the *internal audit* function and the members of the management and control bodies of the Company and/or the Controlled companies.

## **5. Content, updating and conservation of the Register**

- 5.1 With reference to each person on the Register, in compliance with the provisions set out on the templates presented in Annex 1 of Regulation 347, the following information is indicated:
- (a) First name and surname or, for a legal person, institution or professional association, the first name and surname of at least one reference natural person that can identify the persons who have access to Privileged information;
  - (b) The date of birth;
  - (c) The address of residence (or registered office);
  - (d) The tax code or other national identification number, where applicable (or the entry number on the Company Register);
  - (e) The work and private telephone numbers, both landline and mobile;
  - (f) The description of the role, the function and reason for which the person is registered;
  - (g) The date and time at which the person had access to the Privileged Information, or the date and time at which the Person was identified as a person with permanent access to all the Privileged Information, the date and time at which the information referring to the person was updated, and the date and time at which the change that made the update necessary occurred.

The date on which every Single Section and Permanent Section was written, updated and, where appropriate, sent to the competent authority must also be indicated in the Register.

- 5.2 With reference to each person on the RIL, the following information is indicated:
- (a) First name and surname or, for a legal person, institution or professional association, the first name and surname of at least one reference natural person that can identify the persons who have access to Relevant information;

- (b) The work landline telephone number;
- (c) The description of the role, function and reason for which the person is registered;
- (d) The date and time at which the person had access to the Relevant Information, or the date and time at which the person was identified as a person with permanent access to all the Relevant Information, [the date and time of every update of the information referring to the person, and the date and time at which the change that made the update necessary occurred].

The date on which every Occasional Section of the RIL and Permanent Section of the RIL was written, updated and, where appropriate, sent to the competent authority must also be indicated in the RIL.

- 5.3 The Registers will be updated without delay by the Register Manager when (a) the reason for which a Person is present on the Registers changes, (b) a new Person is to be added to the Registers or (c) it is to be noted that a Person on the Registers no longer has access to Relevant Information or Privileged Information, depending on the case, specifying also the date starting from which access is no longer granted. The determinations indicated in article 5.2 above are made by: (i) the Register Manager with reference to each Single Section and each Occasional Section of the RIL, in compliance with the provisions set out in articles 4.4 and 4.5 above; (ii) the board of directors (or the person(s) delegated by him) with reference to the Permanent Section and the Permanent Section of the RIL, in compliance with the provisions set out in article 4.6 above.
- 5.4 The data related to the Persons entered on the Registers are kept for at least five years after the circumstances that determined the creation or updating of the Registers become no longer applicable <sup>(3)</sup>.

## **6. Information obligations towards the Persons**

- 6.1 Immediately after entering a Person on the Register, the Register Manager informs him/her of:
- (a) his/her entry on the Register and the updates that concern him/her;
  - (b) the legal and regulatory obligations deriving from having access to Privileged information; and
  - (c) the penalties laid down by the applicable regulations.

The statement is made through a communication conforming to the template contained in Annex 2 ("*Entry on the Register*"), sent by e-mail or other written means that ensures receipt. The Register Manager informs the Persons already present on the Register of any updates that concern them, through a communication conforming to the template contained in Annex 3 ("*Updating of the data on the Register*") sent by e-mail or other written means that guarantees receipt, and their removal from the Register, where appropriate, through a communication conforming to the template

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<sup>(3)</sup> With reference to the Register, see article 18 of the MAR.

contained in Annex 4 (“*Removal from the Register*”), also sent by e-mail or other written means that guarantees receipt.

- 6.2 Immediately after entering a Person on the RIL, the Register Manager informs him/her, using the most suitable means, of his/her entry on the RIL and sends him/her a copy of this Procedure and the Information Procedure.
- 6.3 The Register Manager keeps on a durable medium a copy of the communications sent to guarantee the proof and traceability of the fulfilment of the information obligations.
- 6.4 The Register Manager gives the Persons that request one a hardcopy of the information contained in the Register that concern them.

## **7. Penalties**

- 7.1 Without prejudice to the Company’s right to compensation for any damage and/or responsibility that may derive from any operations performed by the Persons in violation of this Procedure, failure to observe the obligations and prohibitions laid down by this Procedure will, for the persons present on the RIL, entail the responsibilities laid down in the *pro tempore* legal and regulatory provisions in force and, for the persons present on the Register, also those laid down in the *Insider Register Regulations*.
- 7.2 Failure to fulfil the obligations and prohibitions laid down in this Procedure by the Persons will also entail the application of disciplinary measures, as set out in the collective labour agreement and the obligation to pay the Company and Controlled companies any damages caused to them by the violation of this Procedure, to be intended as an integral part of the labour contract and/or other contractual or fiduciary relationship between the Persons and the Company and/or Controlled companies.

## **8. Final provisions**

- 8.1 Every Person is obliged to:
  - (a) sign in acknowledgement of receipt and return a copy of this Procedure and information Procedure, accepting their contents; and
  - (b) fulfil the obligations set out in them.
- 8.2 The Register Manager is responsible for updating this Procedure in the light of the developments of the *Insider Register Regulations*, the other regulatory provisions as they come into force, the application experience gained, or requests from the supervisory authorities, submitting the proposals for changing and/or updating this Procedure considered necessary, useful or appropriate to the board of directors, through the managing director or chairman of the board of directors.
- 8.3 The Register Manager will, without delay, communicate in writing to the Persons the changes and/or additions made to this Procedure set out in article 8.2 above or the Information Procedure following their approval resolution by the Company’s board of directors and will take the necessary steps to obtain acceptance by the Persons of the new contents of the new procedures and with the methods indicated in article 8.1, above.

8.4 This Procedure is applicable starting from the date of approval by the Company's board of directors.

## ANNEX 1

### Insider Register Regulations

#### **REGULATION (EU) No. 596/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**

**of 16 April 2014**

**on market abuse (market abuse regulations), which abrogates directive 2003/6/EC of the European Parliament and of the Council and Commission directives 2003/124/EC, 2003/125/EC and 2004/72/EC**

#### **Article 18**

##### **(Lists of the persons who have access to privileged information)**

1. The issuing bodies or persons that act in their name or on their behalf:
  - a) Draw up a list of every person with access to privileged information and with whom there is a work relationship, whether it is a permanent or other type of employment contract and that, in performing some tasks, have access to privileged information, such as consultants, accountants or credit rating agencies (list of persons with access to privileged information);
  - b) Promptly update the list of persons with access to privileged information in accordance with paragraph 4; and
  - c) Send the list of persons with access to privileged information to the competent authority as soon as possible at its request.
2. The issuing bodies or persons that act in their name or on their behalf adopt every reasonable measure to make sure that all the persons on the list of persons with access to privileged information acknowledge, in writing, the associated legal and regulatory obligations and are aware of the penalties applied for abuse of privileged information and illegal disclosure of privileged information.

If another person acting in the name or on behalf of the issuing body is given the task of drawing up and updating the list of everyone that has access to privileged information, the issuing body remains fully responsible for fulfilling the obligation laid down in this article. The issuing body retains the right to access the list of persons with access to privileged information.

3. The list of persons with access to privileged information includes at least:
  - a) The identity of all the persons with access to privileged information;

- b) The reason for which these persons are on the list of persons with access to privileged information;
  - c) The date and time at which these persons had access to privileged information; and
  - d) The data on which the list was drawn up.
4. The issuing bodies or other person acting in their name or on their behalf promptly update the list of persons with access to privileged information, adding the date of the update under the following circumstances:
- a) If the reason for the inclusion of a person already on the list of persons with access to privileged information changes;
  - b) If there is a new person with access to privileged information, who must therefore be added to the list of persons with access to privileged information; and
  - c) If a person no longer has access to privileged information.

Each update indicates the date and time at which the change that made the update necessary occurred.

5. The issuing bodies or any other person acting in their name or on their behalf retain the list of persons with access to privileged information for a period of at least five years after its drawing up and updating.
6. The issuing bodies the financial instruments of which are allowed for trading on a growth market for small to medium-sized businesses, are exempted from drawing up a list of the persons with access to privileged information if the following conditions are satisfied:
- a) The issuing body takes every reasonable measure to make sure that all persons with access to privileged information acknowledge the legal and regulatory obligations entailed and are aware of the penalties applicable in case of abuse of privileged information and illegal disclosure of privileged information; and
  - b) The issuing body can provide a list of persons with access to privileged information to the competent authority at its request.
7. This article is applicable to issuing bodies that have requested or authorized the admission of their financial instruments to trading on a regulated market in a member country or, for an instrument only traded on an MTF or OTF, have authorized the trading of their financial instruments on an MTF or OTF or have requested the admission of their financial instruments for trading on an MTF in a member country.
8. Paragraphs 1 to 5 of this article are also applicable to:
- a) Operators on the emissions trading market, with regard to the privileged information about the emissions coming from the concrete activities of the aforesaid operators on the emissions trading market;

- b) Every auction platform, auctioneer and auction monitor for auctions of emissions or other related products auctioned, kept in accordance with regulation (EU) no. 1031/2010.
9. In order to guarantee uniform conditions for implementation of this article, the ESMA elaborates projects of technical implementation rules establishing the precise format of the list of persons with access to privileged information and the format for updating the lists indicated in this article.

The ESMA submits these projects of technical implementation rules to the Commission before 3 July 2016.

The Commission is given the power to adopt the technical implementation rules indicated in the first subsection of article 15 of the regulation (EU) no. 1095/2010.

## **COMMISSION IMPLEMENTING REGULATION (EU) no. 2016/347**

**of 10 March 2016**

**which establishes technical implementing rules regarding the precise format of the lists of persons with access to privileged information and their updating in accordance with the Regulation (EU) no. 596/2014 of the European Parliament and of the Council**

### **Article 1**

*(Definitions)*

In this regulation, «electronic means» is intended to mean electronic equipment for processing (including digital compression), storage and transmission of data via cable, radio waves, optical technologies or any other electromagnetic means.

### **Article 2**

*(Format for drawing up and updating the list of persons with access to privileged information)*

1. The issuing body, the operator on the emission trading market, the auction platform, auctioneer and auction monitor, or any other person acting in their name or on their behalf, divides the list of persons with access to privileged information (the «list») into separate sections, one for each item of privileged information. A new section is added to the list whenever a new item of privileged information is identified in accordance with the definition of article 7 of the Regulation (EU) no. 596/2014. Each section of the list indicates only the data of the persons with access to the privileged information contemplated in the section.

2. The persons mentioned in paragraph 1 can add to the list a supplementary section that indicates the data of the persons that have permanent access to all the privileged information («persons with permanent access»). The data of the persons with permanent access contained in the supplementary section indicated in the first subsection do not appear in the other sections of the list indicated in paragraph 1.
3. The persons mentioned in paragraph 1 write the list and keep it up to date in an electronic format conforming to model 1 of annex I. If the list contains the supplementary section indicated in paragraph 2, the persons mentioned in paragraph 1 draw up and keep up to date this section in an electronic format conforming to template 2 of Annex I.
4. The electronic formats indicated in paragraph 3 guarantee at all times: a) the confidentiality of the information contained in it, ensuring that access to the list is limited to the persons clearly identified which, at the issuing body, the operator on the emissions trading market, the auction platform, auctioneer and auction monitor, or any other person that acts in their name or on their behalf, must gain access to it on the basis of their function or position; b) the correctness of the information contained on the list; c) the access to and retrieval of the previous versions of the list.
5. The list indicated in paragraph 3 is transmitted through the electronic means indicated by the competent authority. The competent authority publishes the indication of the electronic means on its web site. The electronic means ensures that the transmission does not affect the completeness, integrity or confidentiality of the information.

## ANNEX 2

### Entry in the Register

In fulfilment of the provisions contained in article 18 of the Regulation (EU) no. 596/2014 of 16 April 2014 on market abuse, and the Commission Implementing Regulation (EU) 2016/347 of 10 March 2016, which establishes the technical implementation rules on the precise format of the lists of persons with access to privileged information and their updating, and in the procedure of Technogym S.p.A. (“**Company**”) for keeping and updating the persons with access to “**Privileged information**” as defined in it (the “**Procedure**” and the “**Register**”, respectively), I inform you, in my capacity as the person responsible for keeping and updating this Company register, that I have entered you in the Register for the following reason: [*specify reason*]

I remind you that persons with access to Privileged Information and Confidential Information (as defined in the Procedure) must respect the *Insider* Register Regulations described in Annex 1 (“**Insider Register Regulations**”), the Procedure and the provisions contained in the Procedure for the internal management and external communication of documents and information on Technogym S.p.A., annexed to this document and available at the [www.technogym.com](http://www.technogym.com) site.

### Penalties

Below is a short description of the penalties laid down by legislative decree no. 58 of 24 February 1998, as subsequently amended and supplemented (the “**TUF**”) and the regulations applicable for the following crimes (i) abuse of Privileged Information and (ii) market manipulation<sup>4</sup>. [*complete with a description of the applicable penalties*]

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### Personal data protection statement

In accordance with Section 13 of legislative decree no. 196 of 30 June 2003, “*Personal data protection code*”, as subsequently amended and supplemented (the “**Privacy Code**”), we hereby inform you that the personal data that you supplied or that was acquired by other means have been and/or will be subjected to processing (the “**Processing**”), always in full compliance with the applicable legislation, so as to fulfil the obligations imposed on Technogym S.p.A. (the “**Company**”), as it is listed on regulated markets, by force of:

1. article 18 of Regulation (EU) no. 596/2014 on market abuse, which imposes the creation of a register of all persons who have access to privileged information and with whom there is a relationship of professional collaboration, whether it is a permanent or other type of employment contract, and who, in performing certain tasks, have access to privileged information (the “**Register**”) and

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<sup>4</sup> For a more detailed description of the provisions illustrated below, see Part V, Title I-bis of the TUF.

2. the provisions indicated in the Commission Implementing Regulation (EU) no. 2016/347 of 10 March 2016 (“**Regulation 347**”), which contains the technical implementation rules on the precise format of the lists of persons with access to privileged information and their updating.

The Data controller is the Company, based at Via Calcinaro 2861 Cesena.

The person responsible for processing personal data to keep and update the Register is the *pro-tempore* Register manager, who works at the Company’s office at Via Calcinaro 2861, Cesena.

The personal data processed are: surname, first name, tax code, company or organization and other identification data indicated in the Company’s procedure for keeping and updating the Register (the “**Procedure**”) and reason for entry in the Register.

No data other than those indicated are processed.

For the future, other personal data of yours of the same nature can be collected and processed using the methods described below.

The data are processed without any need for your consent in that the Company is fulfilling its legal obligations by processing them.

### **Data processing methods**

The processing of your personal data for the purposes indicated in this statement may include any of the operations or set of operations described in article 4, subsection 1, letter a) of the *Privacy code*, including the collection, recording, organization, conservation, consultation, processing, modification, selection, extraction, comparison, use, interlinking, blocking, communication, deletion and destruction of such data. The data will always be processed in compliance with the legal requirements, both through electronic or otherwise automated instruments and hard copies, adopting, in any case, all the technical and organization measures necessary to guarantee security and confidentiality as laid down in the *Privacy code*, so as to avoid the destruction, loss, unauthorized access or unauthorized processing of the data. Your personal data will be kept on the Company’s premises, at Via Calcinaro 2861, Cesena.

The Company’s staff has been trained to guarantee the confidentiality of the data and to avoid the loss, destruction, unauthorized access and unauthorized processing of your personal data.

You will be informed promptly of their removal from the Register.

Your personal data may come into the possession of employees of the Company responsible for keeping and updating the Register, in their capacity as persons responsible for data processing, and any other persons that, in accordance with the Procedure, are allowed to access the Register.

### **Categories of third parties to whom the data could be communicated**

Your personal data could be communicated to CONSOB and to persons working in the public or private judicial sector who require this data to be able to fulfil the obligations laid down by the Company.

We guarantee that the utmost care is taken to make sure that the personal data communicated to the aforesaid parties consist exclusively of those necessary for the specific purposes for which they are required.

We also inform you that, with regard to the Processing, you are granted, towards the Company, all the rights set out in article 7 of the *Privacy Code*, of which, for the sake of completeness, we set out below the full text, including the right to find out, at any time, what data is being processed and how they are used, and to have them updated, completed and/or collected and to oppose their processing for any legitimate reason. All information about it can be obtained by informally requesting the Company, which holds a list of the parties responsible for processing it.

In the spirit of absolute transparency and fairness with which the Company intends to manage this subject, we remain at your full disposal for any enquiries you may have and offer our collaboration in fulfilling such requests.

Best regards.

Manager responsible for keeping and updating the Register

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### **Section 7 of legislative decree no. 196 of 30 June 2003, as subsequently amended and supplemented: Right to access personal data and other rights**

1. The data subject shall have the right to obtain confirmation as to whether or not personal data concerning him exist, regardless of their being already recorded, and communication of such data in intelligible form.
2. A data subject shall have the right to be informed of:
  - a) the source of the personal data;

- b) the purposes and methods of the processing;
  - c) the logic applied to the processing, if the latter is carried out with the help of electronic means;
  - d) the identification data concerning the data controller, data processors and the representative designated as per Section 5(2);
  - e) the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.
3. A data subject shall have the right to obtain:
- a) updating, rectification or, where interested therein, integration of the data;
  - b) erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;
  - c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement process is impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.
4. A data subject shall have the right to object, in whole or in part:
- a) on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
  - b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.

### ANNEX 3

#### Updating of the data entered in the Register

In fulfilment of the provisions contained in article 18 of the Regulation (EU) no. 596/2014 of 16 April 2014 on market abuse and in the Commission Implementing Regulation (EU) 2016/347 of 10 March 2016, which establishes the technical implementation rules on the precise format of the lists of persons with access to privileged information and their updating, and the procedure of Technogym S.p.A. (the “**Company**”) for keeping and updating the register of persons with access to “Privileged Information” as defined in it (the “**Register**”), I hereby inform you, in my capacity as manager responsible for keeping and updating this Company Register, that on [date], your personal data processed were updated, in particular [indicate the data concerned, which may be the surname, first name, tax code, company or reason for entry in the Register] for the following reason: [indicate the reason].

The Manager responsible for keeping and updating the Register

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## ANNEXE 4

### Removal from the Register

In fulfilment of the provisions contained in article 18 of Regulation (EU) no. 596/2014 of 16 April 2014 on market abuse, and in the Commission Implementing Regulation (EU) 2016/347 of 10 March 2016, which establishes the technical implementation rules on the precise format of the lists of persons with access to privileged information and their updating and the procedure of Technogym S.p.A. (the “**Company**”) for keeping and updating the register of persons with access to “Privileged Information” as defined in it (the “**Register**”), I hereby inform you that, in my capacity as manager responsible for keeping and updating this Company Register, that on [date] the reason for your being on the Register ceased to be valid for the following reasons [*specify reasons*].

Manager responsible for keeping and updating the Register

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