

# Privacy Policy

**This privacy policy describes the processing of personal data collected for fulfilments relating to the corporate governance of Technogym S.p.A., in accordance with Articles 13 and 14 of the GDPR 2016/679.**

## **1) Identity and contact details of Data Controller**

The Data Controller is Technogym S.p.A., based in Cesena (FC), Via Calcinaro no. 2861, tax code and VAT number 06250230965, Economic & Administrative Index no. FC no. 315187.

Technogym can be reached by phone at + 39 0547 56047, by sending a letter to the above address or by sending an email to [informazioni@technogym.com](mailto:informazioni@technogym.com).

Technogym appointed a Responsible for Data Protection/Data Protection Officer (RDP/DPO) who can be contacted by sending an email to [dpo@technogym.com](mailto:dpo@technogym.com).

## **2) Type of personal data collected and processed**

Data collected for corporate fulfilments will be processed, including, by way of example and without limitation, name and surname, date and place of birth, place of residence and tax code. In addition, any interventions by the shareholder or his/her delegate at the shareholders' meeting may be subject to audio and video recording.

The personal data of the delegate and/or any substitutes of the delegate were communicated by the person to whom the right to vote in the capacity of principal is attributed.

## **3) Processing purposes and legal basis of processing**

The data processing is aimed solely at managing the corporate governance activities of Technogym S.p.A. and, in particular:

- a) to manage operations relating to the Company's shareholders' meeting;
- b) to facilitate access to the locations in which the shareholders' meeting is held;
- c) to verify the due submission of lists and the due constitution of the shareholders' meeting;
- d) to ascertain the identity and legitimacy of the attendees, as well as the execution of the additional mandatory shareholders' meeting and corporate fulfilments and formalities.

During the shareholders' meeting, data are also processed using an audio and video recording system, in order to facilitate the minute-taking of the meeting. The audio and video recording will not be disseminated. All data, as well as audio and video media, will be stored together with the documents produced during the shareholders' meeting in order to document what is recorded in the minutes.

The data is processed by paper and/or computerised methods, in respect of the principles established by Regulation (EU) no. 2016/679 and so as to protect the confidentiality of the Data Subject and his/her rights.

That processing is necessary to manage the legal relationship in place with the Company (legal basis: performance of a contract to which the Data Subject is party), to fulfil legal obligations to which the data controller is subject, as well as on the basis of the legitimate interest of the Company as qualified below.

In particular, the provision of personal data requested for the purposes and methods of processing specified above is necessary for the submission of lists of shareholders and for the participation by the same or their delegates at the company's shareholders' meeting, as well

as for the related and consequent legal fulfilments. The lack of or partial communication of personal data may involve the lack of admission of the data subject or his/her delegate to participate in the shareholders' meeting and the impossibility of fulfilling obligations prescribed by existing regulations and/or contracts.

The Company also has the legitimate right to verify the identity of those who are admitted within its registered office, also for security reasons.

#### **4) Recipients or categories of recipients of personal data.**

The personal data collected will be processed by the collaborators, employees, consultants or freelancers of Technogym S.p.A. to execute the organisational and management activities of the shareholders' meeting of Technogym S.p.A..

The data are processed by personnel specifically authorised and/or assigned in writing to process the data (administrative staff), in charge of managing the information systems, even external to the organisation, who may also perform functions of system administrator and are in that case appointed as such, also in the capacity of data processors.

The personal data collected, excluding audio/video media, may be communicated, within the limits strictly pertinent to the obligations and purposes indicated above, to entities identified by law, for the fulfilment of the applicable legal and/or regulatory obligations, considering that the Company is listed on a regulated market and is therefore subject to additional reporting fulfilments and obligations.

The data provided by the shareholder or his/her delegate may be communicated to entities for which there is a reporting obligation in accordance with the law or a need for communication to invoke a right of Technogym S.p.A. at the relevant bodies.

#### **5) Nature of provision of data**

For the purposes of point 3) of this privacy policy, the provision of data is mandatory and their lack of provision may involve the impossibility of obtaining the status of shareholder or his/her delegate admitted to participate at the shareholders' meeting.

#### **6) Storage times**

Pursuant to the provisions of applicable law, the data will be retained together with the minutes produced during the Shareholders' Meeting for 10 years from the date of the relevant minutes, unless it is necessary to retain them for a longer period in connection with specific purposes dictated by law.

The audio and video will be destroyed after producing the minutes and transcription of the shareholders' meeting.

#### **7) Rights of the data subject.**

In accordance with the Regulation, the data subject has the right to obtain at any time access to the Personal Data as well as to know the purposes of processing; the categories of personal data in question; the recipients or categories of recipients to whom the Personal Data have been or will be communicated, particularly if recipients of third countries or international organisations; if possible, the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period; the existence of the right of the data subject to request from the controller the rectification or erasure of Personal Data or restriction of processing of Personal Data or to object to processing; the right to lodge a complaint with the Supervisory Authority to invoke his/her rights; if the Personal Data are not collected from the data subject, all available information on their origin; the existence of an automated

decision-making process, including the profiling indicated in Article 22, paragraphs 1 and 4 of the Regulation and, at least in those cases, meaningful information about the logic used, as

well as the significance and envisaged consequences of such processing for the data subject; the portability of Personal Data.

#### **8) Transfer of Data**

The Data Controller does not transfer the personal data to a third country or to international organisations.