

PRIVACY MANAGEMENT POLICY

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:

- 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;
- collected for specified, explicit and legitimate purposes, and not further processed in a manner that is incompatible with those purposes;
- 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;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- 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;
- 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;
- 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.

In that regard, Rai Way adopts a personal data processing management model - to be applied 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.

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 management responsibilities for the management of 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 of the Privacy management model, also

from the point of view of the related internal control and risk aspects, falls within the remit of the Control, Risks and Sustainability Committee, established within the Board of Directors;

- 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 and internal audits to assess different aspects of the model itself; the IT risk assessment activities carried out annually by Rai Way 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.