



## PROCEDURE FOR THE MANAGEMENT AND DISCLOSURE OF INSIDE INFORMATION

### 1. PREMISE

- 1.1 The listing of the shares and other financial instruments of Rebirth S.p.A. (hereinafter, the “**Company**” or “**Rebirth**”) on the multilateral trading system Euronext Growth Paris will imply compliance with the regulations in force concerning the treatment of Inside Information, the prevention of market abuse by persons in possession of Inside Information, and the monitoring of transactions involving the Company's securities.
- 1.2 This procedure (the “**Procedure**”) was adopted by the Company's Board of Directors at its meeting on 3 February 2025 pursuant to the applicable provisions set out in Regulation (EU) No. 596/2014 of the European Parliament and of the Council of 16 April 2014, as well as AMF Recommendation No. 2016-08 entitled “Guide de l'information permanente et de la gestion de l'information privilégiée” (Guide to Permanent Information and Management of Privileged Information).
- 1.3 The Procedure governs the process of managing Inside Information concerning the Company and the companies, if any, directly or indirectly controlled by it (jointly, the “**Subsidiaries**”) in order to ensure that their disclosure to the outside world is made in a timely and adequate manner, in compliance with the principles of transparency and truthfulness.
- 1.4 The Procedure becomes effective as of the date of commencement of trading of the Financial Instruments (as defined below) of the Company on Euronext Growth Paris, a multilateral trading system organized and managed by Euronext Paris (the “**Euronext Growth Paris**”).

### 2. DEFINITIONS

2.1 Capitalized terms and expressions have the following meanings:

“**AMF**” refers to the Autorité des Marchés Financiers (French financial market regulator).

“**Board of Directors**” means the Board of Directors of the Company from time to time in charge.

“**Board of Statutory Auditors**” means the Board of Statutory Auditors of the Company from time to time in charge.

“**Corporate Affairs Officer**” means the head of the relevant function of the Company.

“**Employees**” means employees of the Company not included among the Relevant Persons.

“**Financial Instruments**” means the financial instruments issued by the Company and admitted to trading on Euronext Growth Paris.

**“Group”** means the Company and its Subsidiaries.

**“Inside Information”** means information of a precise nature, which has not been made public and which directly concerns the Company or one of its Subsidiaries or its Financial Instruments and which, if made public, would be likely to have a significant effect on the prices of the Financial Instruments. For the purposes of this definition:

(a) an information is of “precise nature” if:

- i. refers to a set of circumstances that may reasonably be expected to come into existence or an event that has occurred or may reasonably be expected to occur; and
- ii. is sufficiently specific to enable conclusions to be drawn as to the possible effect of the set of circumstances or event referred to in (i) on the prices of the Financial Instruments;

(b) Information which, if made public, would be likely to have a material effect on the prices of the Financial Instruments means information that a reasonable investor would be likely to use as part of the basis for his investment decisions..

**“MAR”** means Regulation (EU) No 596/2014 of the European Parliament and Council of 16 April 2014.

**“Relevant Persons”** means: (a) the members of the Company's Board of Directors and Board of Statutory Auditors; (b) persons who perform management functions in the Company and managers who have regular access to Inside Information and have the power to make decisions that may affect the development and prospects of the Company; as well as all other persons who, due to their official duties, attend meetings of the administrative body, in relation to all Inside Information concerning the Issuer; (c) persons who perform the functions referred to in (a) and (b) above in a company directly or indirectly controlled by the Company.

**“Subsidiaries”** means the companies controlled by the Company pursuant to Article 2359 of the Italian Civil Code.

### **3. RECIPIENTS OF THE REGULATION**

3.1 This Regulation are intended for the Relevant Persons and contain the provisions concerning the management and handling of Inside Information as well as the methods of external communication of documents and information concerning the Company, with particular reference to Inside Information..

3.2 Pursuant to the MAR Regulation, the AMF's Recommendation No. 2016-08 entitled “Guide to Permanent Information and Management of Inside Information”, as well as the General Rules published by the AMF, the Company shall disclose without delay in the manner provided therein

any Inside Information that directly concerns the Company or its Subsidiaries, upon the occurrence of a set of circumstances or an event, even if not yet formalised.

3.3 The Company shall issue written instructions to its Subsidiaries, if any, to the effect that they shall promptly provide all information necessary to fulfil the disclosure obligations.

#### **4. ASSESSMENT OF THE PRIVILEGED NATURE OF INFORMATION AND TREATMENT OF INSIDE INFORMATION**

4.1 The heads of offices and Chief Executive Officers of the Company and of the companies of the Group shall promptly inform the Chairman of the Board of Directors of the Company as well as the Head of Corporate Affairs of all information concerning the Company and/or the companies of the Group that they consider to be potentially privileged or Price-Sensitive Events (as defined in Article 6 below) and of which they become aware by reason of their working or professional activity, or by reason of their duties. Similarly, Company employees are required to report to their supervisor any information that they consider to be of a potentially privileged nature or Relevant Events of which they become aware by reason of their work activity.

4.2 The assessment of the privileged nature of the information and, therefore, the need to make a disclosure is carried out by the Chairman of the Board of Directors or by each of the Company's Chief Executing Officers, who, for this purpose, avail themselves of the Corporate Affairs Officer.

4.3 The Chief Executive Officer is responsible for the handling of Inside Information. In his absence, the Chairman of the Board of Directors or, in his absence, the Corporate Affairs Officer assumes this responsibility. Both of them, at the times when they are competent, assume the task of the person responsible for the handling of Inside Information (the “**Person Responsible**”).

4.4 The Person Responsible shall handle Inside Information only through authorised channels, and shall ensure that the circulation within the Company and the Group of such Inside Information is carried out without prejudice to its privileged nature.

4.5 It is forbidden for Relevant Persons and all Employees who come to the knowledge of Inside Information by reason of the office held within the Company or the Group to disclose, disseminate or communicate such information in any way to persons other than those to whom such communication is necessary to enable them to perform their relative functions within the Company or the Group.

#### **5. EXCLUSIONS**

5.1 The Company, with the prior consent of the Responsible, may disclose Inside Information confidentially, in compliance with the provisions of applicable laws and regulations to, for example, the following parties:

(a) own advisors and any other parties involved or likely to be involved in the developments or matters in question;

- (b) the auditing firm entrusted with the statutory audit of the Company's accounts;
- (c) parties with whom the Company is negotiating or intends to negotiate any commercial, financial or investment transactions (including likely underwriters or placers of its financial instruments);
- (d) banks in the context of granting credit facilities;
- (e) rating agencies;
- (f) employee representatives or trade unions representing them;
- (g) any government office and any other institutional or regulatory body or authority.

5.2 If the Person Responsible has reason to believe that confidentiality has been or is likely to be breached and, in any event, the matter is such that its knowledge would be likely to lead to a substantial movement in the price of the Financial Instruments, it must publish such information without delay.

## **6. DELAY IN THE DISCLOSURE OF INSIDE INFORMATION**

6.1 Pursuant to Article 17(4) MAR, the Company may, under its own responsibility, delay the public disclosure of Inside Information, provided that all the conditions laid down therein are met, and precisely if:

- i. immediate communication would probably prejudice the legitimate interests of the Company;
- ii. the delay in communication would probably not have the effect of misleading the public;
- iii. the Company is able to guarantee the confidentiality of the Inside Information concerned.

6.2 In the presence of relevant information that could reasonably acquire the nature of Privileged Information in the near future, the Board of Directors or the Chief Executive Officer, as the case may be, before deciding on the privileged nature of the information, shall assess whether the conditions exist for possibly delaying its disclosure to the public in accordance with the MAR, in accordance with the provisions of paragraph 6.1 above, also identifying a probable duration of the delay period. For information that becomes privileged in an unforeseeable manner, the assessment shall be carried out as soon as possible after the establishment of the privileged nature of the information.

6.3 Where the preliminary analyses referred to paragraph 6.2 above do not make it possible to exclude the decision to delay publication, the Company, in compliance with the safeguards and procedures provided for by the Execution Regulation 2016/1055/EU, shall use methods that ensure the accessibility, readability and preservation on a durable medium of the Information in question, as well as prepare an estimate regarding the timeframe for public disclosure of the Inside Information. If the confidentiality of the Inside Information whose publication has been delayed

can no longer be guaranteed, the Company shall take every organizational measure to enable the publication of the Inside Information as soon as possible.

6.4 In any case, during the period of delay in the disclosure of Inside Information and until the publication of the press release, the confidentiality obligations pursuant to Article 8 and the registration of the recipients in the insider register (“**Register**”) shall continue. In addition, the Company shall prepare any draft public disclosure to be released in the event that one of the conditions permitting the delay ceases to exist and shall ensure that the persons involved in the publication process are ready.

6.5 In the case of:

- i. a rumor is detected that explicitly refers to the Inside Information subject to delay, if such rumor is sufficiently accurate to indicate that the confidentiality of such information is no longer guaranteed;
- ii. Privileged Information is disclosed to third parties not bound by an obligation of confidentiality in violation of this Procedure;
- iii. the Chief Executive Officer considers that the reasons for the delay have ceased to exist,

the Chief Executive Officer himself orders the immediate publication of a press release in accordance with the procedure set out in Article 10, consequently updating the Register of Interested Parties. In particular, the communication must be made within the timeframe necessary for the preparation of the press release in order to allow for a complete and correct evaluation of the information by the public and for its subsequent transmission to the Regulated Information Dissemination System chosen by the Company. If the Information becomes Privileged following the closure of the markets, for the purposes of the correct timing of publication, the Company does not take into account the fact that the markets will be closed on the following public holiday.

6.6 Immediately after the publication of the press release relative to Inside Information, the disclosure of which has been delayed in accordance with the preceding paragraphs, the Company shall inform the Competent Authority - the AMF - of the delay by means of a written communication, using the methods indicated by the same Authority. In the event that an explanation in writing of the manner in which the conditions for the delay have been fulfilled must be provided to the Competent Authority at the latter's subsequent request, the Company shall comply with the requests by providing the Authority with a written notice complete with such information as well.

## 7. POSSIBLE EVENTS GENERATING INSIDE INFORMATION

7.1 Set forth below are, by way of example and without limitation, certain events that could constitute a material event or circumstance that could affect an issuer (each, the “**Relevant Fact**”):

- (a) entry into, or withdrawal from, business sectors;
- (b) resignation or appointment of directors or auditors;

- (c) purchase or sale of participations, other assets or business units;
- (d) waiver of engagement by the auditing firm;
- (e) capital operations;
- (f) issues of warrants, bonds or other debt securities;
- (g) changes in the rights of listed financial instruments;
- (h) losses that materially affect net assets;
- (i) merger and demerger operations;
- (j) conclusion, modification or termination of relevant contracts or agreements;
- (k) conclusion of proceedings concerning intangible assets such as inventions, patents or licences;
- (l) relevant legal disputes;
- (m) changes in the company's strategic staff;
- (n) treasury share transactions;
- (o) submitting applications or issuing orders to be subject to insolvency proceedings;
- (p) request for admission to competitive procedures;
- (q) related party transactions;
- (r) issuance by the auditing firm of a qualified opinion, an adverse opinion or a declaration of inability to express an opinion;
- (s) accounting situations intended to be disclosed in the annual financial statements, in the consolidated financial statements and in the condensed half-yearly financial statements, as well as information and accounting situations when they are intended to be disclosed in the interim management statements, when these situations are disclosed to external parties, unless the external parties are bound by obligations of confidentiality and the disclosure is made in application of regulatory obligations, or as soon as they have acquired a sufficient degree of certainty; and
- (t) the resolutions by which the Board of Directors approves the draft financial statements, the dividend distribution proposal, the consolidated financial statements, the condensed half-yearly financial statements and the interim management reports.

## **8. CONFIDENTIALITY DURING THE FORMATION OF INSIDE INFORMATION**

8.1 Relevant Persons and Employees shall take all appropriate measures and precautions in order to:

- (a) avoid access and circulation of confidential information that may be of the nature of Inside Information to unauthorized persons, keeping all documents and information acquired in the performance of one's duties confidential;
- (b) use such documents and information exclusively in the performance of their duties;
- (c) ensuring that the opening and distribution of mail received through the postal service is carried out in accordance with confidentiality criteria.

8.2 Relevant Persons and Employees holding confidential documents or information must keep them in such a way as to minimize, through the adoption of appropriate security measures, the risks of unauthorized access and processing.

8.3 The sender of paper and/or electronic documents containing Inside Information must emphasize its strictly confidential nature by marking them “STRICTLY CONFIDENTIAL”.

8.4 The Relevant Persons and Employees shall be personally responsible for the preservation of the confidential documentation they come into possession of and shall ensure that such documentation is kept in a suitable place so that only authorized persons have access to it. In the event of the loss of documents relative to Inside Information, the Relevant Persons and the Employees involved shall inform the Chief Executive Officer without delay, specifying the conditions and circumstances, so that the latter can take the appropriate measures, including the Publication of Press Release.

## **9. EXTERNAL COMMUNICATION OF INFORMATION CONCERNING THE COMPANY OR ITS SUBSIDIARIES**

9.1 The Responsible proceeds, on behalf of the Company, to manage all relations with the media, professional investors, financial analysts and shareholders.

9.2 The disclosure of information to them shall in any case be made in a complete, timely and appropriate manner, avoiding asymmetries of information between investors or the emergence of situations that might in any case alter the performance of the quotations.

9.3 If the other Relevant Persons are requested by a third party to disclose non-confidential information, data and documents relating to the Company or its Subsidiaries, it is necessary that such Relevant Persons proceed to request the authorization from the Person Responsible and receive written consent from the latter for the disclosure of such information.

9.4 If the information is classifiable as Inside Information, any disclosure to the outside world is the exclusive responsibility of the Manager who, in agreement with the Corporate Affairs Officer, determines whether it is subject to the provisions of Article 17 of the MAR Regulation, also in relation to specific information that does not fall within the aforementioned cases, notifying the interested parties in writing.

## 10. PUBLIC DISCLOSURE OF CONFIDENTIAL INFORMATION

- 10.1 Relevant Persons, Employees and persons who perform their work and/or professional activity in favour of the Company are bound not to disclose in any way, in Italy or abroad, Inside Information concerning the Company or its Subsidiaries of which they have become aware. The obligation of confidentiality also includes information and documents acquired in the performance of their duties, including the contents of discussions held during board meetings.
- 10.2 The Company discloses Inside Information to the public, using the Corporate Affairs Department.
- 10.3 The responsible in collaboration with the Head of Corporate Affairs prepares the public disclosures of Inside Information and carries them out.
- 10.4 Each communication to the public shall contain all Inside Information and shall be disclosed in a complete and timely manner in accordance with the procedures provided by the MAR in order to avoid information asymmetries between the recipients.

## 11. VIOLATIONS

- 11.1 Failure by Relevant Persons to comply with the requirements of the Procedure may result in the breach of the obligations incumbent on the Company as issuer of financial instruments admitted to trading on Euronext Growth Paris and, in particular, the application against the Company of sanctions of various kinds.
- 11.2 Where, due to the failure of Relevant Persons to comply with the requirements contained in this Procedure, the Company is charged with a breach of the MAR Rules or other legal or regulatory provisions (each a “**Breach**”), the Company reserves the right to take action against the Relevant Persons responsible to be held harmless and indemnified, to the fullest extent permitted by law, against any and all costs, expenses, charges or liabilities arising out of or in any way connected with such Breaches, and to be compensated for any and all greater damages.
- 11.3 The competent body to take appropriate measures in the event of infringements of the Procedure is the Board of Directors of the Company.
- 11.4 If they have committed infringements of the Procedure:
- (a) is one of the members of the Board of Directors, the director concerned may not take part in the deliberation aimed at ascertaining the existence and extent of the breach as well as the adoption of the consequent initiatives;
  - (b) is the majority of the members of the Board of Directors, the competent body to take appropriate measures is the Board of Auditors;
  - (c) is an Employee, the infringement may qualify as a disciplinary offence and, in the most serious cases, may result in dismissal.



## 12. REGISTER OF PERSONS WITH ACCESS TO INSIDE INFORMATION

12.1 In accordance with the provisions of Article 18 of the MAR, the Company shall establish and maintain a register in respect of persons in the Company itself and in Subsidiaries and parent companies (if any) who have access to Inside Information (the “**Register**”). The Implementing Regulation 1210/2022/EU (the “**Regulation 1210**”), which, inter alia, repealed the European Regulation (EU) 2016/347 of 10 March 2016, implements the provisions of MAR, and lays down implementing technical standards as to the precise format of the sections of the Register and their updating. Persons who (i) have access on a regular or occasional basis to Inside Information must be entered in the Register, when (ii) such access occurs by reason of their employment or professional activity or by reason of the functions performed on behalf of the entity obliged to maintain the Register. With regard to requirement (i), it is specified that access to Privileged Information is the circumstance that triggers the obligation to enter it in the Register and the legitimacy of the same entry, even if said access is only occasional. In accordance with the provisions of the MAR and Regulation 1210, the Registry is in electronic format, drawn up according to the model provided by Regulation 1210 and is structured in two distinct sections: i) a section for each piece of Inside Information, in which a new section is added every time a new piece of Inside Information is identified (so-called “**occasional section**”); ii) an additional section in which the details of the persons who always have access to all Inside Information are listed (so-called “**permanent section**”). The sections of the Register are prepared on the basis of Model 1 and Model 2 of Annex I to Regulation 1210. The Register consists of a system accessible via Internet/Intranet protected by adequate security systems and access filters and credentials. The Registry must guarantee:

- i. the confidentiality of the information contained therein by ensuring that access to the list is limited to Relevant Persons or any other person acting in their name or on their behalf who must have access to it due to the nature of their respective function or position within the Company;
- ii. the accuracy of the information in the list;
- iii. access and retrieval of previous versions of the list.

12.2 The Register is unique for the Group and is kept by the person identified as the person in charge, with the support of the competent structures of the Company (the “**Register Manager**”) in compliance with the provisions of Regulation 1210. In addition to the functions identified in this Article, the Register Manager shall take care of the criteria and methods to be adopted for the maintenance, management and research of the information contained in the Register, so as to ensure its easy access, management, consultation, extraction and printing. Pursuant to Article 18(2) of the MAR, if another person, acting in the name of or on behalf of the Company, undertakes the task of compiling and updating the Register, the Company remains fully responsible for the obligations under this Article. The Company always retains the right of access to the Register. At the request of the Competent Authority, the Register is transmitted to it by the means indicated on its website. The Chief Executive Officer (or the person(s) delegated by him/her), shall identify, for the purposes of entry in the “permanent section” of the Registry, the persons who, by reason of their work or professional activity or the functions performed, always have access to Inside Information and the reasons for the entry. The data of those entered in the

“permanent section” are not included in the “occasional sections”. If the Company decides not to delay the publication of Inside Information, the persons who had access to Inside Information in the period between the time when the information was classified as privileged and the time when the information was published shall be indicated in the Register. This time lapse must be as short as possible and limited to the technical time required to prepare the press release. Immediately after a person's entry in the Register, the Registry Officer shall inform the person in writing of: (i) his/her entry in the Register; and (ii) the information on the processing of personal data. The Registry Officer shall also update the Registry, which shall be done without delay, adding the date of the update, in the following cases:

- (a) change of the reasons for which a person is registered, including the case where the person's registration has to be moved from one section of the Register to another;
- (b) registration of new persons as having access to Inside Information;
- (c) the loss of access to Inside Information by persons registered (in the “permanent section” or in the “occasional sections”).

12.3 The update must also be arranged, for each registered person, in relation to his or her access to the various successive stages of “maturity” of the set of circumstances or the relevant event giving rise to the Inside Information. The update must indicate the date and time when the change occurred that made the update necessary. The update shall be ordered by the Person Responsible in compliance with the regulations, on the basis of the reports promptly sent by the persons with knowledge of the Inside Information. The Register Manager also informs the Interested Parties already entered in the Register of any updates that concern them, including cancellation, in the same manner as indicated above.

12.4 The Company, or the person acting in its name and on its behalf, must promptly take all reasonable measures to ensure that all persons entered in the Register at the time of their entry, either in writing or by registered mail or communication by hand or by replying by e-mail, take note:

- (a) their entry in the Register, deletion from it and updates of the information contained therein;
- (b) about obligations arising from having access to Inside Information and the sanctions established in the event of breach of such obligations or in the event of unauthorized disclosure of Inside Information.

Each person entered in the Registry must - on receipt of the first communication and any subsequent communications relating to updates of the legal obligations and applicable sanctions and/or of this Procedure - reply by e-mail (to the address indicated in the communication received), stating that he/she has taken note of this Procedure and the legal and regulatory obligations deriving from access to Inside Information, and that he/she is aware of the applicable sanctions in the event of abuse of Inside Information and unlawful communication of Inside Information. The Registry Officer keeps a copy of the communications sent on a durable medium in order to guarantee proof and traceability of the fulfilment of the disclosure obligations. The Registry Officer shall deliver to Interested Parties who so request a copy of the information



concerning them contained in the Registry. The Registry Officer is responsible for updating the Procedure in the light of the evolution of the Registry regulations and other regulatory provisions applicable from time to time and of the application experience gained, submitting to the Managing Director, the proposals for amendment and/or integration of the Procedure deemed necessary or appropriate.

### **13. PROCESSING OF PERSONAL DATA**

For the purposes set out in this Procedure, the Company may be required to process certain personal data of the Relevant Persons. All data relating to Relevant Persons are processed in compliance with the rules adopted by the Company on the protection of personal data and in accordance with applicable legislation. The Data Subjects are therefore informed of the following: a) the purpose and the methods for which the data is intended to be processed; b) the mandatory nature of the provision of the data; c) the subjects, or categories of subjects, to which the data may be communicated and the scope of dissemination of the same; d) the rights provided for in EU Regulation 2016/679; e) the name, surname, name or company name and domicile, residence and registered office of the holder; f) Data Owner: Rebirth S.p.A.

## ANNEX A

### Model Letter of Acceptance

Dear Sir/Madam [SURNAME NAME]

#### Entry in the List of persons with regular access to Inside Information

In accordance with the provisions of Art. 18 of Regulation 596/2014/EU of the European Parliament and Council (the “**MAR Regulation**”) and Implementing Regulation 1210/2022/EU of the European Commission, Rebirth S.p.A. has established a register of those who have regular access to inside information pursuant to art. 7 of the MAR Regulation (hereinafter referred to as “**the Register**”).

In this regard, we inform you that, with effect from [START REGISTRATION DATE], your personal data have been entered into the said Register for the following reason:

[REASONS FOR REGISTRATION]

We remind you that the holders of inside information relating to the Company, for the purposes of their dissemination, must comply with the requirements contained in the Procedure for the management and communication of “inside information”, available on the site “<https://www.re-birth.it>”, Investor Relations section.

#### Sanctions in case of infringement

The abuse of inside information is punishable, in particular, by five years' imprisonment and a fine of 100 million euros, an amount which may be increased up to ten times the benefit derived from the infringement, specifying that the fine may never be less than such benefit<sup>1</sup>.

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In accordance with the provisions of Art. 13 of Regulation EU 679/2016 (“**GDPR**”), we want to inform you that the personal data provided by you to the Company, or otherwise acquired by it, may be processed in compliance with applicable legislation. Please note that processing shall be understood, according to the applicable legislation, as any operation relating to personal data, regardless of the means and procedures used, such as collection, registration, organization, storage, the consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, dissemination, deletion and destruction of data, even if not recorded in a database. This information allows you to know the nature of the personal data that will be inserted in the Register, purpose and manner of their processing, any third party recipients of the same as well as the rights granted to you under the GDPR.

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<sup>1</sup> French Monetary and Financial Code, artt. Da 465-1 a 465-3 e art. 621-15

## **PERSONAL DATA PROCESSED**

Below, we list your personal data - from time to time integrable - that the Data Owner may process:

- (a) personal data (first name, last name, date of birth, full private address);
- (b) tax data (tax code);
- (c) other identification details (personal or business telephone number and company identification details).

The personal data mentioned above will be processed to allow the Data Owner to comply with obligations imposed pursuant to the aforementioned provisions of European and national legislation or to comply with fiscal and contractual obligations. In this regard, we inform you that the failure or incorrect communication of such data could result, among other things, in the impossibility for the Company to:

- verify and ensure the correspondence of the results of the processing itself to the obligations imposed by European legislation on which it is based;
- properly establish or continue the contractual relationship with you, insofar as such data is necessary for the execution of the same.

## **PURPOSE OF PROCESSING**

The personal data, requested or acquired in order to proceed with your registration in the appropriate register, will be processed by the Data Owner for the following purposes:

- (a) effectively manage the obligations related to the burdens arising from Italian and European legislation;
- (b) to comply with obligations imposed by the provisions issued by the Authorities authorized by law and by supervisory and control bodies;
- (c) to assert or defend a right in court (breach of contract, defenses, transactions, recovery of claims, arbitration, litigation), even by a third party.

## **DATA PROCESSORS AND PERSONS RESPONSIBLE**

Your data may be processed by persons responsible (managers, administrators and auditors, internal secretarial offices, accounting and invoicing officers, sales agents for services/products, technical assistance to customers) and/or, if appointed, external processors whose list is freely accessible upon specific written request to be made to the Data Owner.

## **DISCLOSURE OF DATA TO THIRD PARTIES**



Within the limits of the above-mentioned purposes, your data may be communicated by the Company to the following natural persons or legal entity:

- to the subjects with whom the communication and dissemination of data is required or permitted by law, regulation or Community legislation within the limits necessary for the specific purpose;
- to companies that are controlled, controlled and linked to the Data Owner and their employees or consultants, for the fulfilment of legal obligations or for activities related to or consequent to the management, in any contractual respect, of the relationship established with you;
- to the subjects entrusted with the performance of tasks placed at the Company's expense and/or relating to its contractual relationship, with particular reference to accounting obligations;
- to all those who act as external controllers of the processing on behalf of the Data Owner, whose list is freely accessible and constantly updated;
- to external maintainers of our information system and/or the software we use, in case of their failures or security problems of the treatments, for the time strictly necessary to restore functionality;
- to the parties who need access to your data in order to ensure the proper performance of the contractual relationship, within the limits strictly necessary for carrying out auxiliary tasks (for example, credit institutions, freight forwarders, etc.).

In addition, your personal data may be communicated between the companies of the Group, with confidential and restrictive modalities if required, for purposes strictly related to the management and organization of the contractual relationship.

## **TRANSFER ABROAD**

We also inform you that the current structure of the Company does not require the circulation of your personal data outside the territory of the European Union. The data may also be communicated abroad, to countries outside the European Union, taking the appropriate measures and precautions as provided for by the GDPR. The list of subjects to whom data may be communicated is always available upon request to the Company.

## **DATA OWNER**

The Data Owner is Rebirth S.p.A., with registered office in Formello (RM), Via della Selvotta 23, registered at the Rome Commercial Register, REA RM - 1640812, tax code and VAT number no. 1619001007. You may, at any time, address any question regarding the processing of your personal data and any request to exercise the rights that are recognized by the GDPR, by sending a simple communication to the postal address indicated above, or by e-mail, at: [rebirth\\_spa@legalmail.it](mailto:rebirth_spa@legalmail.it)

## **PROCESSING METHODS**

The Data Owner will process your personal data by carrying out all necessary operations using paper and computer tools, in full compliance with the legal conditions, and guaranteeing absolute confidentiality, relevance and not exceeding the purposes described above. In any case, your data



will not be stored for a period longer than 5 (five) years, in order to comply with the legal obligations arising from the European legislation on market abuse. Each processing operation will be carried out by the Company in full compliance with the most appropriate security measures required by applicable legislation. Finally, we inform you that at any time and without any formality you can exercise the rights provided for in articles 15-22 of the GDPR (including, but not limited to, the right to access your personal data, to request its correction, updating and, if necessary, deletion) by means of a request addressed without any formality to the Data Owner or to the person responsible for processing personal data, which can be found at the Company's headquarters. Finally, if you believe that the processing of the data provided violates the legislation on personal data protection, you will have the right to lodge a complaint with the Authority for the protection of personal data. Notwithstanding the above, you may at any time ask the Data Owner to block the processing of your personal data, except those directly or indirectly necessary for the fulfilment by the Company of legal obligations or otherwise indispensable to the management of your contractual relationship.

### **The Insider Registry Officer**

For acceptance \_\_\_\_\_.