

## SHAREHOLDERS' PRIVACY POLICY

### Version 02/2025

Edison S.p.A. (hereinafter "**Edison**", the "**Company**", or "**Data controller**"), as Data controller, informs you that, pursuant to article 13 of the General Data Protection Regulation 2016/679 (hereinafter "**Regulation**" or "**GDPR**"), your personal data, collected directly from you, as a result of your status as a shareholder of the Company and, consequently, as a person authorized to participate in the Company's shareholders' meetings, will be processed in accordance with this privacy policy, in compliance with the provisions of the Regulation and in relation to the purposes set out below.

This privacy policy applies to all persons authorized to participate in the Edison's shareholders' meetings (hereinafter jointly referred to as "**Data Subjects**" or, individually, "**Data Subject**"), to which you are a party.

### 1. Categories of personal data processed

The personal data processed are:

- a) **Common personal data**, e.g. biographical data, tax code, VAT number, home address and company address, domicile, company affiliation, telephone number and e-mail address;
- b) **identification data**, e.g. the data contained in the identification document.

In the following, the categories mentioned above will be jointly referred to as "**Data**".

### 2. Purposes and legal basis of the processing

The Data collected are processed for the following purposes:

#### *i)* Processing purposes whose legal basis is the fulfilment of legal obligation

- 1) to allow the exercise of the rights related to the ownership of your shares and, in particular, the participation in the shareholders' meeting, the exercise of voting right, if any, and the verification of the regular constitution of the aforementioned meeting;
- 2) to fulfill the Data controller's obligations provided for by law, Regulations, EU legislation, or by virtue of provisions/requests from Authorities and/or Supervisory and Control Bodies authorized by law;
- 3) to perform any other necessary activities to fulfill the obligations under sectoral legislation, including EU regulations and ordinary laws.

The provision of your Data for these purposes is mandatory; therefore, any refusal will make it impossible to pursue them.

#### *ii)* Processing purposes whose legal basis is the Data controller's legitimate interest

- 1) to allow for the defense of rights in the course of judicial, administrative, or extrajudicial proceedings, and in the context of litigations.

### 3. Processing's Modalities

Regarding the above-mentioned purposes, the processing of your Data is carried out both by means of IT tools and on paper supports; in any case, adequate tools will be used to guarantee the safety, confidentiality, integrity and availability of the same Data through the adoption of adequate security measures, according to the Regulation's requirements.

### 4. Data retention period

We inform you that your Data are processed:

- for as long as is strictly necessary to allow the exercise of rights related to the ownership of your shares;
- for the time strictly necessary to carry out legal obligations to which the Company is subject and/or requests received by authorized Authorities;
- for the time strictly necessary to pursue the protection of the right, in particular for the duration of the litigation, until the expiry of the terms for bringing and/or appealing actions.

## 5. Categories of recipients of the Data and international transfer

Your Data may be known, within the limits of the purposes reported in point no. 2, by persons authorized and duly instructed by the Data controller.

Furthermore, your Data may also be known by the Data controller's subsidiaries/parent companies or affiliates, subjects who are the transferees of a company or a business branch, companies resulting from possible mergers, demergers, or other transformations of the Data controller, Public Security Authorities, and Judicial Authorities, external structures – appointed, if necessary, as data processors – responsible for carrying out activities connected or consequent to the processing purposes pursued.

In any case, your Data will be processed within the European Union (“**EU**”) and the European Economic Area (“**EEA**”) and, therefore, stored on servers located within the EU and the EEA. If it becomes necessary to transfer your Data to non-EU/EEA countries, these will be transferred in accordance with the provisions of Chapter V of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

## 6. Dissemination of Data

Your Data will not be disseminated in any way, without your specific and prior authorization, outside the Company's perimeter and/or published on the Company's website, except as required by law.

## 7. Data Protection Officer

This figure, provided for by the Regulation, has been identified as a common reference for the Edison Group companies subject to direction and coordination or controlled by Edison S.p.A. or by other companies within the Company's perimeter. The references to contact the Data Protection Officer are provided below.

## 8. Exercise of rights

Pursuant to Articles 15 to 22 of the GDPR, you have the right to obtain from the Data controller access, rectification, integration, or deletion (so-called right to be forgotten) of your Data, the portability of the same, the right to obtain the restriction of processing, as well as to object to the processing of your personal data.

You can exercise your rights by writing to the attention of the Data Protection Officer (“**DPO**”) at the email address [privacy@edison.it](mailto:privacy@edison.it), or by sending a registered letter with return receipt to: EDISON S.p.A., Foro Buonaparte 31 – 20121, Milan.

Furthermore, if you believe that the processing concerning you violates Regulation (EU) no. 2016/679, you have the right to lodge a complaint with the Data Protection Authority, using the information provided on the website [www.garanteprivacy.it](http://www.garanteprivacy.it), and to take appropriate legal action.

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