



Notice to Shareholders pursuant to the General Data Protection Regulation

Dear Shareholder,

ENAV S.p.A., with registered office in Via Salaria n. 716 – 00138 Rome, VAT registration number 97016000586 (“**ENAV**” or “**Controller**”), in its capacity as controller pursuant to the Regulation (EU) no. 2016/679 (“**General Data Protection Regulation**” or “**GDPR**”), will process Personal Data (as defined hereafter) in compliance with the provisions of the above legislation as well as with the present notice.

Data Protection Officer

The Controller appointed a Data Protection Officer (“**DPO**”) which can be reached at the following email address dpo@enav.it.

Subject matter and means of processing of Personal Data

The Controller will process identifying personal data (such as name, surname, residence) provided by you or the personal data concerning third parties (e.g., proxy holders or sub-delegates of proxy holders) provided by you (“**Personal Data**”) with respect to participation in the Shareholders’ Meeting (the “**Meeting**”) and to any further activities thereto related, i.e. by way of a non-exhaustive exemplification in connection with voting and participating in the Meeting and proposing additions to the agenda of the Meeting.

Processing of Personal Data under this notice means any operation or set of operations that is performed on Personal Data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The Processing of Personal Data will be carried out manually and/or with the use of computerized or data transmission systems.

Purpose and legal basis for the processing of Personal Data

The Controller will process the Personal Data in relation to the holding of the Shareholders’ Meeting, in particular with respect to participation in the latter, the right to request additions to the Meeting agenda and proposals for resolutions on the agenda items, and the right to ask questions before the Meeting.

The legal basis for the processing is represented by the Controller’s statutory obligation to grant the exercise by you – also through proxy holders or sub-delegates of proxy holders – of the rights granted by applicable law in relation to participation in the Meeting.

The transmission and the processing of Personal Data are necessary for the abovementioned purposes. Failure to transmit such Personal Data will make it impossible to allow the exercise of such rights and any requests.

Recipients of Personal Data

In compliance with the principle of data minimization, the Personal Data may be disclosed - for the aforementioned purposes - to:

- i. employees and partners of the Controller which are entrusted with data processing before, during and after the Meeting;
- ii. third-party companies or other persons that carry out activities on behalf of the Controller;

ENAV S.p.A.

Via Salaria, 716 – 00138 Roma
Tel. +39 06 81661 – Cap. Soc. € 541.744.385,00 I.V.
P.IVA 02152021008 – Reg. Imp. Roma
C.F. e CCIAA 97016000586 – REA 965162
www.ENAV.it



- iii. Computershare S.p.A., a company not belonging to ENAV, appointed as processor for the purposes of ensuring protection of the shareholders' rights provided for by applicable law.

Transfer of Personal Data

Your Personal Data will be processed within the European Union and stored on server clouds located within the European Union.

Your Personal Data shall not be transferred onward abroad to Non-EU Countries that do not ensure an adequate level of personal protection, within the meaning of the GDPR. The onward transfer of Personal Data to such Countries shall only take place subject to the formalization of agreements containing appropriate safeguards for the protection of personal data and in compliance with the applicable Italian and EU Law.

Storage Periods for Personal Data

The Personal Data provided will be stored pursuant to the proportionality principle until the purposes of the processing are pursued and, in any case, for a period not exceeding 10 years and will not be communicated to third parties, except for the purpose of complying with applicable law or regulations. Such period is compliant with the provisions of Consob Resolution no. 11971 of 14 May 1999 (the "Issuers' Regulation"), which requires issuers to disclose regulated information on their internet website and to keep such regulated information available for five years.

Rights of data subjects

With reference to the Personal Data provided, you are entitled under the applicable laws to exercise the following rights:

- i. right to obtain access to and obtain a copy;
- ii. right to request rectification and/or erasure;
- iii. right to restriction of processing;
- iv. right to object to the processing;
- v. right to receive the personal data in a structured, commonly used and machine-readable format and right to transmit the data to another controller.

To exercise the above rights, you may send a request to the Controller or to the Data Protection Officer, mandatorily indicating "ENAV Shareholders' Meeting" in the subject line:

- by ordinary email at the following address: dpo@enav.it
- by certified email at the following address: protocollogenerale@pec.enav.it
- by registered mail with return receipt at the following address: ENAV S.p.A., Via Salaria 716 - Roma (Italia)

We remind you that the applicable laws provide for the right to lodge a complaint with Garante per la Protezione dei Dati Personali, the Italian data protection authority, tel. (+39) 06.696771, email: garante@gdpd.it.

This privacy notice is updated to 8 April 2020