



## 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 code 97016000586 (“ENAV” or “Controller”), in its capacity as controller pursuant to the Regulation (UE) n. 2016/679 (“General Data Protection Regulation” or “GDPR”), will process Personal Data (as defined hereafter) in compliance with the provisions of the applicable laws herein 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](mailto:dpo@enav.it).

### Object and means of processing of Personal Data

The Controller will process the identifying personal data (such as name, surname, residence) provided by you or the personal data concerning third parties (e.g., sub-delegated or substitutes of proxy holders) provided by you (“Personal Data”) with respect to attendance to 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 intervening in the Meeting and proposing addition to the agenda of the Meeting.

Processing of Personal Data under this notice means any operation or set of operations which 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 mechanisms and by means of information technology systems.

### Purpose and legal basis for the processing of Personal Data

The Controller will process the Personal Data in relation to the attendance to the Shareholders’ Meeting, in particular with respect to the attendance to the latter in person or by proxy, to the right to add items on the agenda and to ask questions before the Meeting.

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

The transmission and the processing of the Personal Data are necessary for the abovementioned purposes. Failure to transmit such Personal Data determines the impossibility to allow exercise of such rights and requests as made from time to time.

### 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 the data processing before, during and after the Meeting;
- b) third companies or other persons that carry out activities on behalf of the Controller;



c) 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 the applicable laws.

### **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. Transfer onward of Personal Data to such Countries shall eventually take place only 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 the applicable laws or regulations. Such period is compliant with the provisions of Consob Resolution no. 11971 of May 14, 1999 (the “**Issuers’ Regulation**”), which requires issuers to disclose regulated information on their internet website and to maintain 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 access to and obtain copy;
- ii. right to request rectification and/or erasure;
- iii. right to obtain the restriction of processing;
- iv. right to object the processing;
- v. right to receive the personal data in a structured, commonly used and machine-readable format and right to transmit those data to another controller.

For the exercise of the above-mentioned rights, you may send a request to the Controller or to the Data Protection Officer, mandatorily indicating in the subject “ENAV Shareholders’ Meeting”, via the following:

- by ordinary email at the following address; [dpo@enav.it](mailto:dpo@enav.it)
- by registered email at the following address: [protocollogenerale@pec.enav.it](mailto:protocollogenerale@pec.enav.it)
- by registered mail 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](mailto:garante@gdpd.it).

*This privacy notice is updated at 15 March 2019*

