PRIVACY POLICY INVESTOR RELATIONS MASSIMO ZANETTI BEVERAGE GROUP

This information is provided, pursuant to art. 13 of Decree 196/2003, to users of the website of INVESTOR RELATIONS Massimo Zanetti Beverage Group Spa, whose home page is found at the address: investors.mzb-group.com.

This information describes the operation of the official website of INVESTOR RELATIONS Massimo Zanetti Beverage Group Spa, but does not cover any external websites that users might visit using links. Additional information may be supplied within the various access channels, grouped by subject area. Other information may be found on the website, in relation to the specific services available.

Purpose of Processing

The Data Controller, for persons identified or identifiable as having visited this website, is Massimo Zanetti Beverage Group Spa.

Objectives of data handling

The personal data provided on a voluntary basis will be processed for the following purposes:

- browsing this website;
- contacting you to provide any information you have requested;
- accounting and administrative activities in general, and compliance with legal requirements.

Type of Data Processed and Method of Collection

- Browsing data - log files

Users can visit this website without being asked to provide any personal data. As part of their routine operations, the IT systems and applications dedicated to the functioning of this website record certain data (whose transmission is an inherent part of using Internet communications protocols) not associated with directly identifiable users. The data collected includes the IP addresses of the users who visit the website, the addresses of the resources requested in URI (Uniform Resource Identifier) notation, the time of the request and a code number indicating the status of the response given by the server (success, error, etc.). This data is processed for the time strictly necessary, pursuant to current legislation, and may be used to identify those responsible for hypothetical IT crimes against this website.

- Data provided voluntarily by the user

The voluntary and explicit sending of e-mails to the addresses indicated in the various access channels to this website results in collection of the address and data of the sender/user, which are necessary in order to respond to the instances generated and/or to provide the requested service. We assure you that such processing will always be carried out in accordance with the principles of propriety, legality, transparency and confidentiality required by Decree 196/03.

COOKIES - COOKIE POLICY

- What does a cookie contain?

A cookie is a simple text file that is stored on a computer or mobile device by the server of a website. This server will subsequently be able to recover or read the contents of the cookie. Cookies are managed by your Internet browser. Each cookie is unique and contains anonymous information, such as a unique identifier, the name of the website, numbers or letters. It enables the website to remember the browsing preferences of the user.

The website investors.mzb-group.com does not use cookies to transmit personal data. The cookies used are essentially:

- Technical session cookies that allow the user to carry over information between pages of the website, without having to input it several times.
- Persistent cookies that help to compile statistical analyses, enabling us to understand how users
 visit the website, so that we can improve website-user interaction in subsequent updates. Data is
 therefore collected for statistical purposes, in an aggregated and anonymous form.
- Third-party cookies. We use (see the next point on "Google Analytics") analytical/performance cookies that enable us to count the number of visitors and note how they browse the website. The data is aggregated, not individual. These cookies help us to understand how to improve the website i.e., how to help future users find the information they seek even faster.

These cookies do not allow acquisition of the user's personal identification data. If desired, it is possible to block some or all cookies or even delete the cookies already stored on your computer; however, you should also be aware that certain website functionality might be lost as a result. Users of a number of different devices must ensure that each browser is configured correctly. Users can easily delete all the cookies stored in the cookie folder by following the procedures envisaged for the browser used.

- Consent for the use of cookies

The user is provided brief information that refers to this complete information.

Users consent to the use of cookies if they do not interact with the forms, click "OK", "X", leave the information by scrolling the page, close the page or continue to browse the website.

- Google Analytics

In order to comply with the contractual undertakings given to Google and exclude Google from any responsibility for the content of the website, users are informed that "Google Analytics is a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer to allow the website to analyze, in an anonymous manner, how visitors use the website. The information generated by the cookie about use of the website will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of tracking and examining use of the website by visitors, compiling reports on website activity for its administrators and providing other services relating to website activity and Internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate the IP addresses of users with any other information held by Google. Users may refuse the use of cookies by selecting the appropriate browser settings, but this might impede use of all the functions offered by the website. By using this website, without modifying the browser settings to disable cookies, users consent to the processing of their data by Google in the manner and for the purposes set out above".

Privacy Policies of certain third parties that use cookies on our website

Privacy Policy Google: https://www.google.it/intl/it/policies/privacy/

A free tool allows users to disable Google Analytics:: https://tools.google.com/dlpage/gaoptout?hl=it

-Your choices regarding cookies

You have various options for the management of cookies. The parameters set by you might alter the way you browse the Internet and your conditions for accessing certain services that require the use of cookies. You can choose at any time to select and modify your choices regarding cookies in the manner described below.

Options offered by your browser

It is possible to configure your browser so that cookies are stored on your device or, conversely, are rejected either systematically or depending on the sender. You can also set the browser so that you are prompted to accept or refuse cookies on a timely basis, perhaps even before they are stored on your device. For further information, see "How to make your choices, depending on the browser used".

-Consent for cookies

The storage of a cookie on a device is essentially dependent on the wishes of the user, who may select and modify at any time, without charge, the options offered by the browser. If, via your browser, you have accepted the storage of cookies on your device, the cookies embedded in the web pages and content that you have viewed might be retained temporarily in a reserved area of your device. These cookies are only legible by the issuer.

-Refusal of cookies

If you refuse the storage of cookies on your device, or remove those already stored, you might not be able to use all the interactive functions available. This will be the case if you try to access our content or services that require identification. The same is true if we, or our vendors, are unable to recognize in terms of technical compatibility the browser used by your device, the language and display settings, or the country from which your device is connected to the Internet. In such cases, we decline all responsibility for the consequences deriving from the poor functioning of our services, due to our inability to store or read the cookies needed for our work that you have refused or deleted.

-How to make your choices, depending on the browser used

The configuration of each browser differs when it comes to the management of cookies and your choices. Your browser's help menu will enable you to understand how to configure your browser and change your choices in relation to cookies.

Internet Explorer™: http://windows.microsoft.com/it-it/internet-explorer/delete-manage-cookies#ie=ie-11

Safari™: https://support.apple.com/it-it/HT201265

Chrome™: https://support.google.com/accounts/answer/61416?hl=it

Firefox™: http://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie

Opera™: http://help.opera.com/Windows/10.20/it/cookies.html

If you do not intend to allow the storage of cookies on your device, you can directly configure your browser for this, or use certain add-on applications available on the market.

Optional nature of the provision of data

Except as specified for the browsing data, the provision of personal data by the data subject, for the purposes described in the preceding paragraph, is optional. Failure to provide such data may however make it impossible to use certain services provided by the website.

Methods used to process data

Personal data is processed using automated equipment for the time strictly necessary to achieve the purpose for which it was collected. Specific security measures are observed to prevent the loss of such data, illegal and improper uses and unauthorized access.

Communication and/or dissemination of data

Your data, held for processing, will not be disseminated but may be communicated to companies contractually linked to Massimo Zanetti Beverage Group Spa, even within the E.U., at the European parent company, in compliance with and to the extent allowed by art. 42 of Decree 196/2003. Your personal data may also be transferred abroad, to non-EU countries, in compliance with and to the extent allowed by arts. 43 and 44 b) of Decree 196/2003, in order to comply with contracts or for related purposes. The data may be communicated to third parties that fall into the following categories:

- parties that provide services for the management of the IT systems used by Massimo Zanetti Beverage Group spa and its telecommunications networks (including the e-mail system);
- offices and companies that provide support and advisory services;
- competent authorities, in order to comply with legal obligations and/or the instructions received from public entities.

The parties belonging to the above categories act as Data Processors, or operate as entirely independent Data Controllers. The list of data processors is constantly updated and is available from the registered offices of Massimo Zanetti Beverage Group spa. Any other forms of communication or dissemination will only take place with your explicit consent.

Rights of Data Subjects

"Data Subjects", being the natural persons, legal persons, entities and associations to which the data relates, are entitled at any time to obtain confirmation of the existence or otherwise of their data, and to know its content and origin, check its accuracy and request its update or the addition of supplementary data, or its rectification pursuant to art. 7 of Decree 196 dated 06/30/2003. Pursuant to the above article, data subjects are also entitled to request the deletion, transformation into an anonymous form or the blocking of their data, processed in violation of the law, as well as to object in all cases, for legitimate reasons, to its processing.

Any communications may be sent to this e-mail address: investors @mzb-group.com or by fax to +39 0422 312 692