

PRIVACY POLICY
Art. 13 Regulation (EU) 679/2016

- Ordinary and Extraordinary Shareholders' Meeting April 22, 2020 -

Pursuant to Regulation (EU) 2016/679 ("**GDPR**") and the applicable national regulation (Italian Legislative Decree no. 196/2003 as per the latest amendments) – jointly referred to hereinafter as "**Applicable Regulations**" – Massimo Zanetti Beverage Group S.p.A. (the "**Company**"), in its capacity as data controller, must provide interested parties with information on the processing of their personal data, this being defined as any information concerning the interested parties.

Categories of personal data

The Company collects, processes and uses the following categories of personal data:

- personal details (e.g. name, tax code, place and date of birth);
- contact details (e.g. address of residence, telephone number, e-mail address);
- number of shares.

Purposes of the processing and legal bases

Personal data are collected and processed exclusively for the purpose of verifying the due constitution of the Shareholders' Meeting, to ascertain the identity and entitlement to attend the meeting of those present, and to execute any further mandatory formalities and obligations of the Shareholders' Meeting and the Company.

The legal basis of processing is the fulfilment of the obligations set forth by applicable laws and the legitimate interest of the Company to manage the operations necessary to attain the above purposes.

Method and nature of the Data Processing

During the Shareholders' Meeting, data are also processed using an audio and video recording system, in order to facilitate the minute-taking of the meeting. The audio and video recording will not be disseminated. All data, as well as audio and video media, will be stored together with the documents produced during the Shareholders' Meeting in order to document what is recorded in the minutes.

The data is processed by paper and/or computerised methods, in respect of the principles established by the Applicable Regulations and so as to protect the confidentiality of the Data Subject and his/her rights.

Providing the personal data requested, for the above purposes and processing, is necessary to attend the Shareholders' Meeting and to fulfil the obligations pertaining thereto and resulting therefrom. If such data are not provided or are provided only in part, the data subject may not be admitted to the Shareholders' Meeting, in accordance with applicable laws, and/ or it may be impossible to fulfil the obligations set forth by current laws and/or contracts.

Data retention period

The data collected will be retained only for the period strictly necessary to attain the above purposes. Upon termination of the required period of retention, the data will be promptly deleted.

MASSIMO ZANETTI BEVERAGE GROUP S.p.A.

Categories of data recipients

The personal data collected may be disclosed, within the limits strictly necessary to fulfil the above obligations and purposes, to the necessary recipients, in order to fulfil legal and/or regulatory obligations and/or the obligations set forth by EU legislation (taking into account that the company is listed on a regulated market and is therefore subject to additional fulfilments and disclosure obligations).

The recipients who may become aware of the personal data are the following:

- persons responsible for the corporate secretariat, including the administrative and supervisory bodies of the Company;
- third parties (e.g. advisory service companies, IT service companies), who act as Data Processors;
- Public authorities, if necessary.

Rights of the data subject

The Applicable Regulations give the parties involved the rights described in articles 15-22 of GDPR, such as, by way of example, the right to obtain confirmation of the existence of the corresponding data, the right to access these data, the right to verify their content, source, accuracy; the right to require that the data are integrated, updated, deleted or made anonymous following breaches of the law; the right to obtain your data in a structured, commonly used, machine-readable format, in the cases provided for by article 20 of the GDPR (data portability); the right to object to the processing or request restriction on legitimate grounds. You may also complain to the supervisory authorities (the Personal Data Protection Supervisor), at any time. To exercise these rights, please contact the Data Controller through the references here below. The exercise of the above-mentioned rights may be delayed, restricted or excluded in the presence of precise conditions as specified by article 2-*undecies* Legislative Decree 196/2003 as amended from time to time.

Data Controller

The Data Controller is Massimo Zanetti Beverage Group S.p.A., which may be contacted at the following email address affari.societari@mzb-group.com.