

DEDALUS

INFORMATION NOTICE SUPPLIERS AND BUSINESS PARTNERS

The Dedalus Group attaches a great deal of importance to and intends to pay particular attention to protecting your personal data and respecting your privacy.

The aim of this privacy information notice is therefore to inform you of how your personal data is processed when you act on behalf of a supplier or business partner of the Dedalus Group (e.g., employee, intern, company representative, etc.).

In this respect, please note that the data fiduciary of your personal data is the Dedalus Group entity that has among its suppliers or prospects the entity on behalf of which you are acting (hereinafter referred to as “**we**”, “**our**” and “**us**”). Please refer to the address information of the Dedalus Group entity on our website www.dedalus.com or you can find this information in your contractual documentation. Please refer to Section 7 (“*How can you contact us?*”) below to access the contact details of the relevant data fiduciary.

1 WHAT PERSONAL DATA DO WE COLLECT?

We collect the following categories of personal data about you:

- Identification data (e.g., surname, first name, contact details, etc.).
- Professional data (e.g., position held, identity of your employer, etc.).

The provision of your personal data is **voluntary**; but in most cases, we will be unable to manage our working relationship with the entity on behalf of which you are acting properly without it. For example, if you refuse to provide us with your contact details so we can send you an agreement to sign, we will be unable to enter into an agreement with the entity on behalf of which you are acting.

In any case, we will inform you when it is mandatory to provide your personal data.

Additionally, in the event that you provide us with personal data belonging to third parties (e.g. if you provide us with the data of a signatory so we can prepare the agreement to be signed), you undertake to ensure that such persons have been duly informed of the processing of their personal data in accordance with this policy and, if required, have consented to the processing of their personal data.

2 WHY DO WE USE YOUR PERSONAL DATA?

The table below outlines the purposes for which we process your personal data for and, for each purpose, the legal basis for the processing operation in question:

PURPOSES	LEGAL BASIS
Relationship management with suppliers, service providers and business partners (e.g., agents, etc.), including, but not limited to: (i) preparation and performance of agreements; (ii) management and follow-up of orders placed by us; (iii) payment of invoices; etc.	The processing is on the basis that you have voluntarily provided your personal data and have not indicated that you do not consent to the processing for the specified purpose and is necessary for the performance of a contract or to take steps at your request to enter a contract.
Where applicable, studying, organizing, and executing transactions relating to our activities, particularly in the context of mergers and acquisitions, spin-offs, etc. In this context, the processing of personal data is limited to the contact and identification details of key stakeholders and is processed only to the extent necessary and incidental to the assessment, management and execution of the relevant corporate transactions and associated documentation.	The processing is on the basis that you have voluntarily provided your personal data and have not indicated that you do not consent to the processing for the specified purpose of finding investors / buyers / stakeholders who may be interested in our business.
Analysis of data for business intelligence purposes in order to improve our understanding of internal business processes, evaluate the effectiveness and efficiency of our management system and assess initiatives	The processing is based on your explicit consent and our legitimate interest to analyze our organization and improve internal processes
Compliance with the applicable legal framework	Need to comply with a legal obligation that we are subject to.
Managing and following up potential disputes with you or third parties	The processing is necessary to manage the contract and to pursue our legitimate interest to collect the sums due and to defend our interests, including through legal action and, where applicable, if certain categories of data (conviction, offense, security measure) are processed, the need to establish, exercise or defend our legal claims and for compliance with any judgment or decree or order issued under any law for the time being in force in India, or any judgment or order relating to claims of a contractual or civil nature under any law for the time being in force outside of India.

In any case, please note that we will not process your personal data for any other purpose that is incompatible with the above-mentioned purposes.

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WHO DO WE SHARE YOUR PERSONAL DATA WITH?

In the context of our processing operations, we may communicate your personal data to the following recipients:

- to our service providers, suppliers, agents, and contractors, to the extent that they assist us in carrying out the purposes set out in this policy (e.g., we use IT service providers to host your personal data on our behalf; etc.).
- to other entities of the Dedalus Group (e.g., in the context of our accounting / fiscal obligations, we may have to share a certain amount of information, including personal data concerning you, for consolidation purposes at Dedalus Group level, e.g. some services may be contracted by the holding in favor of all group entities).
- where applicable, to investors / buyers and their advisors (e.g., in the context of mergers and acquisitions).
- to competent courts, public authorities, government agencies and law enforcement agencies (including where we are required to comply with legal or regulatory requests).

Regardless of the recipient, we will only disclose your personal data to them on a strictly need-to-know basis and only to the extent required to fulfill the purposes identified in this policy.

We do not sell your personal data.

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DO WE TRANSFER DATA OUTSIDE INDIA?

In connection with the processing operations described in this policy, we may transfer your personal data outside India to the extent legally permissible.

In this context, we will ensure that the level of protection your personal data is given is not adversely affected by such transfers.

This specifically means that each of the intended transfers is the fact that the transferee maintains the same level of data protection as the relevant Dedalus Group entity and is governed by appropriate valid contracts.

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HOW LONG DO WE STORE YOUR PERSONAL DATA FOR?

We store your personal data for no longer than is necessary for the purpose of the processing concerned.

In other words, this means that the storage periods we apply vary depending on the purpose for which we process the data in question. Notwithstanding the foregoing, we will retain personal data, associated traffic data and other logs of all processing activities for a period of **at least 1 (one) year** from the data of such processing for purposes prescribed under applicable data protection law.

The table below therefore indicates, for each purpose, the storage period that will be applied to your personal data:

PURPOSES	STORAGE PERIOD
Relationship management with suppliers, service providers and business partners (e.g., agents, etc.), including, but not limited to: (i) preparation and performance of agreements; (ii) management and follow-up of orders placed by us; (iii) payment of invoices; etc.	Subject to local legislation, for a general period of 10 years after the end of our contractual relationship with the supplier, service provider or business partner on behalf of which you are acting.
Where applicable, studying, organizing, and executing transactions relating to our activities, particularly in the context of mergers and acquisitions, spin-offs, etc. In this context, the processing of personal data is limited to the contact and identification details of key stakeholders and is processed only to the extent necessary and incidental to the assessment, management and execution of the relevant corporate transactions and associated documentation.	Your data will only be stored for as long as is necessary to assess the appropriateness of the proposed transactions and, if necessary, to carry them out. Your records will form part of our corporate records and will be retained for as long as required under applicable local legislations.
Analysis of data for business intelligence purposes in order to improve our understanding of internal business processes, evaluate the effectiveness and efficiency of our management system and assess initiatives	We will process your personal data until your withdrawal of consent.
Compliance with the applicable legal framework	Your data will be stored for the duration of the limitation period of the obligations that we are subject to.
Managing and following up potential disputes with you or third parties	Your data will be stored for the duration of the dispute and until all potential remedies have been exhausted.

We have also defined an archiving policy. This ensures that your personal data is not stored in the active database unnecessarily.

In any case, once the applicable storage period has elapsed, we will irrevocably erase or anonymize your personal data so that you can no longer be identified.

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WHAT RIGHTS DO YOU HAVE?

In accordance with the applicable data protection legal framework, particularly the GDPR, you have the following rights as a data principal:

- You may request access to your personal data and request that it be corrected or erased.

- Where processing of your personal data is based on your consent, please note that you may withdraw your consent at any time, without affecting the lawfulness of processing based on your consent carried out prior to your withdrawal of the same, or where you have voluntarily provided your personal data.
- You have the right to grievance redressal in respect of our obligations and/or your rights, for which we will respond to you within 90 days from the date of receipt of your grievance.
- You have the right to nominate any other individual to exercise your rights as a data principal on your behalf, in the event of your death or incapacity. To do so, please provide us with the relevant information of such nominee, or as requested by us, to ensure our proper handling of the requests made on your behalf.

However, please note that some of the above rights are subject to specific conditions dictated by the applicable data protection legal framework. So, if your specific situation does not meet these conditions, we will be unable to comply with your request.

To exercise your rights, including lodging a grievance with us, please contact our group DPO / Designated Contact Person using the contact details provided in Section 7 (*How can you contact us?*). To process your request as efficiently as possible, we may ask you for certain additional information (e.g., name, supplier or partner name) to confirm your identity and/or assist in locating the personal data that forms the subject matter of your request.

In any case, please note that you may also lodge a complaint with the competent supervisory authority prescribed under the applicable data protection framework.

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WHAT ARE YOUR RESPONSIBILITIES AS DATA PRINCIPAL?

In accordance with the applicable data protection legal framework, you are required to comply with certain duties as a data principal, including:

- Complying with the provisions of all applicable laws while exercising your rights as set out above;
- Ensuring that you do not impersonate another person while providing their personal data for a specified purpose;
- Ensuring that you do not suppress any material information while providing your personal data in relation to any document, unique identifier, proof of identity, or proof of address issued by a competent authority;
- Ensuring that you do not file any false or frivolous grievance or complaint with us as the data fiduciary or with the competent supervisory authority; and
- Furnishing only such information as is verifiably authentic while exercising your right to correction or erasure, where applicable.

Please note that failure to comply with your duties as a data principal may result in the imposition of applicable administrative fines by the competent supervisory authority.

Your personal data will be processed by the Dedalus Group Company with which you have entered into the contractual/pre-contractual relationship, which will act as the data fiduciary. The data fiduciary can be contacted at the address of its registered office, as indicated on the respective website and in the contractual documentation.

We also have appointed a group data protection officer (“**DPO**”), which you can contact by e-mail at the following address:

for Dedalus S.p.A dpo.group@dedalus.eu

for other companies based in Italy dpo@dedalus.eu

for companies based in UK dpo-uk@dedalus.group.

for companies based in France dpo.france@dedalus.eu

for companies based in Germany/Austria dpo.dach@dedalus.com

for companies based in India designatedcontactperson-india@dedalus.com

for other companies dpo.group@dedalus.eu

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