

DEDALUS

INFORMATION NOTICE CLIENTS AND PROSPECTS

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 information notice is therefore to inform you of how your personal data is processed when you act on behalf of a client or prospect of the Dedalus Group (e.g., employee, intern, company representative, etc.).

In this respect, please note that the controller of your personal data is the Dedalus Group entity that has among its clients or prospects the entity on behalf of which you are acting (hereinafter referred to as “we”, “our” and “us”). Please refer to Section 7 (“How can you contact us?”) below to access the contact details of the relevant controller.

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.).

In most cases, provision of your personal data is mandatory; 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.

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WHY DO WE USE YOUR PERSONAL DATA?

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

PURPOSES	LEGAL BASIS
Client and prospect relationship management, including, but not limited to: (i) preparation and performance of agreements; (ii) order management and follow-up; (iii) invoicing; (iv)	The processing is necessary for the performance of a contract or to take steps at your request to enter a contract

accounting of client accounts; (v) management of requests, complaints, and after-sales service; etc.	
Carrying out commercial marketing operations and sending marketing communications	The processing is based on your consent and/or our legitimate interest in developing our client base.
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	Our legitimate interest to analyze our organization and improve internal processes
Carrying out satisfaction surveys of commercial statistics with clients / prospects and managing opinions on our products and services	The processing is based on your consent and/or our legitimate interest to know how satisfied our clients and prospects are and to better know their needs and views.
Where applicable, studying, organizing, and executing transactions relating to our activities, particularly in the context of mergers and acquisitions, spin-offs, etc.	Our legitimate interest in finding and managing investors / buyers / other stakeholders who may be interested in our business.
Compliance with the applicable legal framework	Need to comply with a legal obligation that we are subject to.
Managing and following up unpaid bills, as well as 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.

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 information notice (e.g., we use IT service providers to host your personal data on our behalf; in the case of unpaid invoices, we may use the services of service providers specialized in debt collection; 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). The list of Dedalus Group entities is available here: <https://www.dedalus.com/global/en/privacy/>

- 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 information notice.

We do not sell your personal data.

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DO WE TRANSFER DATA OUTSIDE BOSNIA AND HERZEGOVINA AND THE EUROPEAN ECONOMIC AREA?

In connection with the processing operations described in this policy, we transfer your personal data outside Bosnia and Herzegovina and the European Economic Area (“**EEA**”), including to countries that are not recognized by the European Commission as providing an adequate level of data protection.

In this context, we 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 based on one of the following mechanisms at least:

- the existence of an adequacy decision issued by the European Commission or BiH Council of Ministers for the country that your personal data is transferred to; or, alternatively;
- the conclusion of standard contractual clauses reproducing the models adopted by the Agency for Personal Data Protection of Bosnia and Herzegovina; or, alternatively;
- the existence of an exemption related to one of the specific situations exhaustively provided for by the General Data Protection Regulation 2016/679 (“**GDPR**”) and Articles 46 to 51 of the Law on Personal Data Protection of Bosnia and Herzegovina (e.g. where you have given your consent to such transfer having been informed of the absence of safeguards, where the transfer is necessary for the performance of a contract concluded between you and us, where the transfer is necessary for the conclusion or performance of a contract concluded in your interest between us and a third party, or where the transfer is necessary for the establishment, exercise or defense of our legal claims, etc.).

You can obtain copies of these documents by emailing our Data Protection Officer (“**DPO**”), whose contact details are set out in Section 7 (*How can you contact us?*) below.

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

PURPOSES	STORAGE PERIOD
Client and prospect relationship management, including, but not limited to: (i) preparation and performance of agreements; (ii) order management and follow-up; (iii) invoicing; (iv) accounting of client accounts; (v) management of requests, complaints, and after-sales service; etc.	<p>If you are acting on behalf of one of our clients, we will retain your personal data for up to 10 years after the end of our contractual relationship with the client concerned.</p> <p>If you are acting on behalf of one of our prospects, we will retain your personal data until the withdrawal of the consent.</p>
Carrying out commercial marketing operations	<p>If you are acting on behalf of one of our clients, we will retain your personal data for up to 2 years after the end of our contractual relationship with the client concerned.</p> <p>If you are acting on behalf of one of our prospects, we will retain your personal data until the withdrawal of the consent.</p> <p>However, if you object to our commercial marketing activities, we will immediately delete your personal data for this purpose (except for only the data that is strictly necessary to keep track of your objection and thus not send you any further commercial communication).</p>
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	For the duration necessary to carry out the business intelligence analysis
Carrying out satisfaction surveys of commercial statistics with clients / prospects and managing opinions on our products and services	Your data will not be stored for longer than is necessary for completing said surveys and/or until the withdrawal of the consent.
Where applicable, studying, organizing, and executing transactions relating to our activities, particularly in the context of mergers and acquisitions, spin-offs, etc.	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.
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 unpaid bills, as well as potential disputes with you or third parties	Your data will be stored for the duration of the recovery / 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 and the BiH DP Law, you have the following rights as a data subject:

- **Right of access:** You may request access to your personal data under Article 15 of the GDPR and Article 17 of the BiH DP Law.
- **Right of rectification:** You have the right to request immediate rectification of inaccurate or incomplete details of your personal data under Article 16 of the GDPR and Article 18 of the BiH DP Law.
- **Right to erasure:** You have the right to have your personal data erased under Article 17 of the GDPR and Article 19 of the BiH DP Law. You can request, for example, that your data be erased if it is no longer necessary for the purpose for which it was collected or if you withdraw your consent when your personal data was processed on the basis of your consent.
- **Right to restriction of processing:** You have the right to request that processing of your personal data be restricted under Article 18 of the GDPR and Article 20 of the BiH DP Law.
- **Right to object:** You have the right to object to the processing of your personal data under Article 20 of the GDPR and Article 22 of the BiH DP Law.
- **Right to data portability:** You have the right to portability of your personal data if we process your data on the basis of your consent or in relation to performance of contract, and use automated means of processing to this end, you have the right to receive your data in a structured, commonly used and machine-readable format and to transmit this data to another controller under Article 20 of the GDPR and Article 22 of the BiH DP Law.
- **Right to withdraw consent:** 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 under Article 7 of the GDPR and Article 9 of the BiH DP Law.

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, please contact our DPO 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 to confirm your identity and/or assist in locating the personal data that forms the subject matter of your request.

Right to lodge a complaint: In any case, under Article 82 of the BiH DP Law you may lodge a complaint with the relevant Data Protection Authority, i.e. Agency for Personal Data Protection of

Bosnia and Herzegovina (<https://www.azlp.ba>), as the supervisory authority for personal data protection in Bosnia and Herzegovina, as well as to file a claim to the competent court.

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HOW CAN YOU CONTACT US?

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 Controller. The Data Controller 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 data protection officer (“**DPO**”), which you can contact by e-mail at the following address:

for Dedalus HC d.o.o. dpo.group@dedalus.eu

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 other companies dpo.group@dedalus.eu

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