

PRIVACY NOTICE - SUPPLIERS

Pursuant to Regulation (EU) 2016/679 ("GDPR") and the applicable privacy provisions, the following information is provided in relation to the processing of personal data provided by you during the selection, establishment and management of the contractual relationship or otherwise acquired as part of the contractual relationships. The information contained in this notice is provided pursuant to Articles 13 and 14 of Regulation 2016/679/EU of 27 April 2016 ("GDPR").

1. Data Controller and Data Protection Officer

The Data Controller is the Safilo Group company with which the contractual relationship of supply or collaboration is in place (the "Company" or the "Data Controller").

The Data Controller has appointed a *Data Protection Officer* ('DPO'), who can be contacted at the following e-mail address: dpo@safilo.com

2. Categories of data processed

The information that the Company may process, within the limits of the purposes and methods described in this information notice, can be classified as "Common Personal Data", which includes identification and contact data (such as, for example, name and surname, address, VAT number, tax code or specific identification number of the supplier e-mail addresses) of yourself or of your legal representatives, attorneys, employees, those involved in the management of the contractual relationship as well as company name, payment and bank details, as well as attestations and certifications functional to the evaluation and coding of the counterparty¹, in the case of sole proprietorships and/or partnerships.

3. Purposes of processing, legal bases and period of data retention

The Company may process your data for the following purposes:

1. Selection and evaluation of the offer, evaluation and coding of the counterparty, or activities preliminary to the establishment of a relationship with the Data Controller (also using internal IT resources, including, where applicable, the "Safilo Digital Vendor Code" portal).

Legal basis for the purpose referred to in point 1: execution of pre-contractual measures, Art. 6, letter b) of the GDPR: "*processing is necessary for the performance of a contract to which the data subject is party or for the performance of pre-contractual measures taken at the data subject's request*". The processing of the Data is necessary and if it is not provided, it will not be possible to enter into any contractual relationship with the Company.

2. Establishment, management and organization of activities relating to the relationship with suppliers, as well as management of administrative, accounting, tax and any audits and verifications arising from the contractual relationship established.

Legal basis for the purpose referred to in point 2: execution and proper management of the contract concluded between you and the Company, art. 6 b) of the GDPR: "*processing is necessary for the performance of a contract to which the data subject is party or for the performance of contractual measures taken at the request of the data subject*". The processing of the Data is necessary and if it is not provided, it will not be possible to enter into any contractual relationship with the Company.

3. Fulfilment of legal and regulatory, accounting, tax, contributory or any other obligations related to the above. In addition, the Company may process your Data in execution of the *Whistleblowing* legislation to ensure the proper handling of *Whistleblowing* reports, as better specified in the dedicated notice.

Legal basis for the purpose referred to in point 3: fulfilment of legal obligations, Art. 6, letter c) of the GDPR: "*processing is necessary for compliance with a legal obligation to which the data controller is subject*". The

¹ In the case of legal persons, these attestations and certifications will refer to the company.

processing of the Data is necessary and if it is not provided, it will not be possible for the Company to fulfil its legal obligations.

4. Litigation management in the event of defaults, disputes, judicial disputes and/or settlements, as well as, in general, for the protection of the rights and legitimate interests of the Controller and/or third parties, including in court.

Legal basis for the purpose referred to in point 4: legitimate interest of the Data Controller and/or third parties, which, by virtue of the assessments carried out by the Company, does not appear to be prejudicial to your rights, Art. 6(f) of the GDPR: *"processing is necessary for the purposes of pursuing the legitimate interests of the Data Controller or third parties, provided that the interests or the fundamental rights and freedoms of the data subject which require the protection of personal data do not prevail"*.

Period of Data Retention: Your Data will be processed for the entire duration of the contractual relationship with the Company, after which they will be retained for a period of 10 years from the end of the contractual relationship in compliance with the ordinary limitation periods identified by the Civil Code or specific legal provisions, for administrative purposes and/or to assert or defend a right or legitimate interest, and they will be deleted when the purposes for which they were collected no longer apply.

4. Modalities of Data Processing

The processing of the Data shall take place by means of computerized and/or telematic tools, suitable to guarantee security and confidentiality, and shall be carried out by personnel duly instructed in compliance with the legislation on the protection of personal data, as well as formally entrusted with the processing of the Data.

5. Data recipients

Your data may be brought to the attention of employees and collaborators of the Data Controller, in their capacity as authorized processors, who will process them solely for the purpose of carrying out their respective work duties.

Furthermore, your Data may be communicated, for the above-mentioned purposes, to the following categories of subjects: (i) other companies belonging to Safilo Group which take part in the logistic and commercial production cycle; (ii) persons, companies, associations or professional offices which provide services and activities of assistance and consultancy to the Company (such as, for example, data processing companies, documentation filing companies, suppliers of logistic services, professional consultants); (iii) banking institutions. The subjects belonging to the above categories will use the Data as autonomous data controllers or as data processors.

Finally, the Data processed may be communicated to parties whose right to access the Data is recognized by provisions of law and secondary legislation or provisions issued by the competent authorities.

6. Transfer of Data Abroad

Your Data may be transferred to subjects established outside the European Economic Area ("EEA"), in countries in which Safilo Group companies are present, for the above purposes and on the basis of adequate intra-group guarantees. The list of companies (with a side indication of the existence or not of an adequacy decision of the European Commission for the respective countries), as well as a copy of the above intragroup guarantees can be requested from the following e-mail address: dataprotection@safilo.com

7. Rights of data subjects

You may exercise, in the cases expressly provided for by law, the rights set out in Articles 15-22 of the GDPR. In particular, you have the right to:



- request confirmation that your Data is being processed and, if so, ask the Data Controller for access to information relating to that processing;
- request the rectification of inaccurate or incomplete Data;
- ask the Data Controller to delete the Data;
- request restriction of processing;
- request to receive in a commonly used and machine-readable format the Data concerning you and to transmit them to another data controller, or to obtain direct transmission from one data controller to another, if technically feasible (so-called data portability);
- where the processing of your Data is based on consent, revoke such consent at any time. Such revocation shall not affect the lawfulness of the processing carried out prior to the revocation.

You also have the right to object, in whole or in part, on legitimate grounds, to the processing of personal data concerning you.

The Data Controller shall do so without delay and, at the latest, within one month of receipt of the request. The deadline may be extended by two months if necessary, considering the complexity and number of requests received by the Controller. In such cases, the Controller shall, within one month of receipt of your request, inform you and inform you of the reasons for the extension.

You may exercise these rights by sending an e-mail request to the Controller at the following e-mail address: dataprotection@safilo.com

Finally, if you consider that the processing of your Data violates the legislation on the protection of personal data, you have the right to lodge a complaint with the Data Protection Authority.

8. Updating of information

This notice was updated in May 2025.