

PRIVACY NOTICE FOR CUSTOMERS, SUPPLIERS AND SHAREHOLDERS

Pursuant to Article 13 of Regulation (EU) 2016/679 (GDPR)

In accordance with Article 13 of Regulation (EU) 2016/679 (hereinafter "GDPR"), R.A.W. s.r.l. (hereinafter "RAW" or the "Controller") provides the following information regarding the processing of your personal data collected in connection with : (i) the negotiation, conclusion and performance of the contractual relationship with customers and suppliers; and (ii) the establishment and management of the shareholding relationship with shareholders.

1. Data Controller

The Data Controller is R.A.W. S.r.l., with registered office at Viale Premuda 46, 20129 Milano (MI), Italy, and operational headquarters at Via Soperga 13, 20127 Milano (MI), Italy, fiscal code 03462790126. For any privacy-related request, please contact: privacy@endo-sight.it.

2. Data Protection Officer

R.A.W. s.r.l. has assessed that the appointment of a Data Protection Officer is not mandatory under Article 37 GDPR, as the Company does not carry out large-scale systematic processing of special categories of data or systematic monitoring of data subjects as a core activity. A preliminary assessment has been carried out and documented internally to confirm this conclusion.

3. Categories of Personal Data Processed

For the purposes of this notice, "personal data" means data relating to natural persons processed by RAW. Depending on the applicable category of data subject, the following personal data are processed:

Customers and Suppliers:

- Basic personal data of the customer/supplier who is a natural person: full name, address, contact details, fiscal code, VAT number, bank details;
- Basic personal data of the legal representative of the customer/supplier where a legal person: full name, contact details;
- Full name and email address of employees, collaborators or contact persons of the customer/supplier company involved in the activities covered by the contract.

Shareholders:

- Basic personal data: full name, date and place of birth, tax identification code, address, contact details;
- Corporate data: shareholding percentage, details of shares held, data relating to corporate transactions (transfers, pledges, etc.);

No special categories of data (Article 9 GDPR) are processed in connection with the customer, supplier or shareholding relationship.

4. Purposes of Processing and Legal Basis

Purpose	Legal Basis
Company relationships, legal obligation	Article 6(1)(b) GDPR - processing necessary for the performance of a contract, Article 6(1)(c) - compliance with a legal obligation to which the Controller is subject

5. Data retention period

Category of personal data	Retention period
Basic personal data (natural person)	For the entire duration of the contractual/corporate relationship and subsequently for the time necessary to comply with legal and contractual obligations (minimum 10 years, Art. 2220 c.c.)
Companies' information	For the entire duration of the contractual/corporate relationship and subsequently for the time necessary to comply with legal and contractual obligations (minimum 10 years, Art. 2220 c.c.)

6. Recipients of Personal Data

Your personal data may be communicated, to the extent strictly relevant to the purposes described above, to:

- RAW personnel who need access in the performance of their duties, and who are duly authorised;
- External service providers acting as Data Processors pursuant to Article 28 GDPR (e.g. accountant), all bound by appropriate data processing agreements;
- For shareholders, public authorities and public administrations entitled to receive such data by law (e.g. Agenzia delle Entrate, Chamber of Commerce, other competent authorities).

Personal data will not be sold or disclosed to third parties for commercial purposes and will not be transferred outside the European Economic Area (EEA).

7. Security measures

RAW implements appropriate technical and organizational measures to ensure the security of your personal data in accordance with Article 32 GDPR. Data is stored in a secure cloud archive located in the European Union with access restricted to authorized personnel only.

8. Your rights as a Data Subject

Pursuant to Articles 15–22 GDPR, you have the right to:

- Access your personal data (Art. 15 GDPR);
- Rectify inaccurate or incomplete data (Art. 16 GDPR);
- Erasure of your data, where applicable (Art. 17 GDPR);
- Restriction of processing (Art. 18 GDPR);
- Data portability, where applicable (Art. 20 GDPR)

To exercise any of the above rights, please contact the Data Controller at: privacy@endo-sight.it. You also have the right to lodge a complaint with the competent supervisory authority (Art. 77 GDPR): in Italy, the Garante per la Protezione dei Dati Personali (www.garanteprivacy.it); or the supervisory authority of the EU Member State where you habitually reside, work, or where the alleged infringement took place.

9. Nature of Data Provision

The provision of personal data for the purposes described in Section 4 is necessary for the negotiation and performance of the contract and for compliance with applicable legal obligations. Failure to provide such data may make it impossible for RAW to enter into or perform the contract.

10. Automated Decision-Making and Profiling

RAW does not carry out any automated decision-making or profiling activities that produce legal or similarly significant effects on customers, suppliers or shareholders, in accordance with Article 22 GDPR.

11. Changes to this Notice

RAW may update this privacy notice where necessary. Any material changes will be communicated to data subjects as required by applicable law.