Information Notice pursuant to Article 13 of Regulation (EU) 2016/679 and the applicable national legislation on the protection of personal data

In accordance with the principles set out in the Guidelines on the use of tracking pixels in email communications approved by the Italian Data Protection Authority (the "Authority" or the "Garante") by Measure No. 284 of 17 April 2026, and pursuant to Regulation (EU) 2016/679 (the "Regulation" or "GDPR") and the applicable national legislation on the protection of personal data (together with the GDPR, the "Data Protection Legislation"), Mediobanca – Banca di Credito Finanziario S.p.A., with registered office in Milan, Piazzetta Enrico Cuccia 1 (the "Company" or the "Controller"), acting as data controller, is required to provide this notice concerning the use of the personal data of users who receive electronic communications containing tracking pixels.

1. What tracking pixels are

Tracking pixels are small graphic elements, often transparent and extremely small in size, namely a single pixel, which are not embedded directly in electronic communications but are hosted on remote servers.

Tracking pixels are inserted into electronic communications and make it possible to detect the user's interaction with the communication. When the recipient opens the message, these tools may collect information such as whether the email was opened, the date and time it was viewed, the IP address, the type of device or application used, and the number of times the message was viewed.

The use of tracking pixels makes it possible to collect information concerning the user's interaction with the message received, as described in this notice.

2. Purposes and legal basis of the processing

The use of tracking pixels varies according to the purpose pursued. In certain cases, these tools may be used for technical or security purposes, or to prepare

aggregated statistics. In other cases, where required by applicable law, their use requires the data subject's consent.

Personal data collected through tracking pixels are processed for the following purposes:

a) **technical management related to the operation of the service and security of electronic communications**

The data may be processed to ensure the proper delivery of communications, verify any anomalies or misuse of IT systems, and ensure the security of the Bank's technological infrastructure.

As this purpose falls within the exemptions provided for by the Measure, the legal basis for the processing is the pursuit of the Controller's legitimate interest pursuant to Article 6(1)(f) GDPR.

b) **analysis of the effectiveness of communications and preparation of aggregated and anonymised statistics**

Anonymised data may be processed to analyse, on an aggregated basis, opening rates, interaction with messages, and recipients' preferences, in order to improve the Bank's content and communication methods.

The legal basis for the processing is the pursuit of the Controller's legitimate interest pursuant to Article 6(1)(f) GDPR.

3. Categories of personal data processed

In relation to the purposes described above, the Company may process, through tracking pixels embedded in electronic communications, personal data including, by way of example and without limitation:

- confirmation that the communication was opened;
- date and time of opening;
- number of times the communication was viewed;
- IP address used;
- information about the device, operating system, and email client used;
- technical information relating to the use of the electronic communication.

This information may be associated with the recipient's email address and with other data already held by the Company in connection with its relationship

with the data subject.

4. Means of processing

Personal data will be processed in compliance with the Data Protection Legislation, using IT or telematic tools, according to methods strictly related to the stated purposes and, in any event, in a manner designed to ensure security and confidentiality in accordance with the Data Protection Legislation.
Specific security measures are implemented to prevent data loss, unlawful or improper use, and unauthorised access.

5. Disclosure and dissemination of personal data

Personal data may be processed by Company personnel who are authorised to process such data and have been instructed in accordance with applicable law.
The data may also be disclosed to other Group companies and to companies, consultants, and technology service providers that support the Company in managing electronic communications and the related IT platforms, duly appointed as processors pursuant to Article 28 GDPR or acting as independent controllers where provided for by law. The complete and up-to-date list of the Company's processors is available on www.mediobanca.com in the "Privacy" section.
If, in connection with the use of platforms for the sending and monitoring of electronic communications, it becomes necessary to transfer personal data to countries outside the European Economic Area, such transfer will take place only where there is an adequacy decision of the European Commission or other appropriate safeguards provided for by the Data Protection Legislation, including binding corporate rules and standard contractual clauses.
Personal data processed by the Company are not disseminated.

6. Retention period

In accordance with the principles of proportionality and necessity, personal data will be retained in a form permitting identification of data subjects for no longer than is necessary to achieve the purposes for which they are processed, taking into account:

- the need to continue retaining the personal data collected in order to provide the services agreed with the user or to protect the Controller's legitimate interest, as described in the purposes above and in accordance with the assessments carried out by the Company;
- the existence of specific statutory obligations, including civil law, anti-money laundering, investment services, and tax monitoring requirements, or contractual obligations that make it necessary to process and retain the data for specified periods of time.

The Company takes reasonable measures to ensure that inaccurate personal data are rectified or erased.

7. Data Controller and Data Protection Officer

The Data Controller is Mediobanca – Banca di Credito Finanziario S.p.A., with registered office in Milan, Piazzetta Enrico Cuccia 1.

The Company has appointed a Data Protection Officer.

The Data Protection Officer may be contacted at the following addresses:

DPO.mediobanca@mediobanca.com

dpomediobanca@pec.mediobanca.com

8. Data subject rights

Users have the right, at any time, to obtain confirmation as to whether or not their personal data exist, to be informed of their content and origin, to verify their accuracy, and to request that they be supplemented, updated, or rectified (Articles 15 and 16 GDPR).

Data subjects also have the right to request erasure, restriction of processing, and data portability, as well as the right to lodge a complaint with the supervisory authority and, in any event, to object to processing on legitimate grounds (Articles 17 et seq. GDPR).

Requests must be addressed to the Company at privacy@mediobanca.com.

Data subjects also have the right to object at any time, on grounds relating to their particular situation, to processing carried out on the basis of the Controller's legitimate interest pursuant to Article 21 GDPR.